



FINAL ENVIRONMENTAL IMPACT REPORT



CITY AND COUNTY OF SAN FRANCISCO PLANNING DEPARTMENT

491 Bayshore Boulevard, Home Depot

2001.0062E

State Clearinghouse No. 2000032010

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VOLUME 1

Draft EIR Publication Date: March 29, 2003

Draft EIR Public Hearing Date: July 10, 2003

Draft EIR Public Comment Period: March 29 – July 11, 2003

Final EIR Certification Date: July 28, 2005

*Changes from the text of the Draft EIR are indicated by solid dots (●) at the beginning of each revised section, paragraph, graphic, or table. Specific edits (with **new** and ~~deleted~~ changes) are shown in Chapter VII Section E.*

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City and County of San Francisco
Planning Department

VOLUME 1

**491 BAYSHORE BOULEVARD,
HOME DEPOT**

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491 Bayshore Boulevard, Home Depot
● Final Environmental Impact Report

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● July 28, 2005

File No: 2001.0062E
491 Bayshore Boulevard
Assessor's Block 5598, Lots 8, 9, 11, 13, 15,
16, 18, 21 and 28

SAN FRANCISCO
CITY PLANNING COMMISSION
MOTION NO. 17071

ADOPTING FINDINGS RELATED TO THE CERTIFICATION OF A FINAL
ENVIRONMENTAL IMPACT REPORT FOR THE PROPOSED 491 BAYSHORE
BOULEVARD PROJECT – A 153,098 SQUARE FOOT HOME DEPOT

MOVED, That the San Francisco Planning Commission (hereinafter “Commission”) hereby CERTIFIES the Final Environmental Impact Report identified as case file No. 2001.0062ED, 491 Bayshore Boulevard Project (hereinafter “Project”) based upon the following findings:

1) The City and County of San Francisco, acting through the Planning Department (hereinafter “Department”), fulfilled all procedural requirements of the California Environmental Quality Act (Cal. Pub. Res. Code Section 21000 *et seq.*, hereinafter “CEQA”), the State CEQA Guidelines (Cal. Admin. Code Title 14, Section 15000 *et seq.*, hereinafter “CEQA Guidelines”), and Chapter 31 of the San Francisco Administrative Code (hereinafter “Chapter 31”).

a. The Department determined that an Environmental Impact Report (hereinafter “EIR”) was required and provided public notice of that determination by publication in a newspaper of general circulation on March 9, 2002.

b. On March 29, 2003, the Department published the Draft Environmental Impact Report (hereinafter “DEIR”) and provided public notice in a newspaper of general circulation of the availability of the DEIR for public review and comment and of the date and time of the Planning Commission public hearing on the DEIR; this notice was mailed to the Department’s list of persons requesting such notice.

c. Notices of Availability of the DEIR and of the date and time of the public hearing were posted near the project site on or about March 29, 2003.

d. On March 29, 2003, copies of the DEIR were delivered to the State Clearinghouse for distribution to government agencies. On March 29, 2003, copies of the DEIR were mailed or otherwise delivered to a list of persons requesting it, to those noted on the distribution list in the DEIR, to adjacent property owners, and to government agencies.

e. Notice of Completion was filed with the State Secretary of Resources via the State Clearinghouse on March 29, 2003.

CITY PLANNING COMMISSION

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Assessor's Block 5598, Lots 8, 9, 11, 13, 15,
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- 2) The Commission held a duly advertised public hearing on said DEIR on July 10, 2003, at which opportunity for public comment was given, and public comment was received on the DEIR. The period for acceptance of written comments ended on July 11, 2003.
- 3) The Department prepared responses to comments on environmental issues received at the public hearing and in writing during the public review period for the DEIR, prepared revisions to the text of the DEIR in response to comments received or based on additional information that became available during the public review period, and corrected errors in the DEIR. This material was presented in the "Comments and Responses" published on June 28, 2005, which was distributed to the Commission and to all parties who commented on the DEIR, and was available to others upon request at Department offices.
- 4) A Final Environmental Impact Report (hereinafter "FEIR") has been prepared by the Department, consisting of the DEIR, any consultations and comments received during the review process, and the Comments and Responses all as required by law. Since publication of the DEIR, no new information of significance has become available that would require recirculation of the EIR under CEQA Guidelines Section 15088.5.
- 5) Project Environmental Impact Report files have been made available for review by the Commission and the public. These files are available for public review by appointment at the Department offices at 1660 Mission Street, and are part of the record before the Commission.
- 6) On July 28, 2005, the Commission reviewed and considered the FEIR and hereby does find that the contents of said report and the procedures through which the FEIR was prepared, publicized and reviewed comply with the provisions of CEQA, the CEQA Guidelines and Chapter 31.
- 7) The Planning Commission hereby does find that the FEIR concerning File No. 2001.0062ED: 491 Bayshore Boulevard Project reflects the independent judgment and analysis of the City and County of San Francisco, is adequate, accurate and objective, and that the Comments and Responses contains no significant revisions to the DEIR, and hereby does CERTIFY THE COMPLETION of said Final Environmental Impact Report in compliance with CEQA and the CEQA Guidelines.
- 8) The Commission, in certifying the completion of said FEIR, hereby does find that the proposed project described and evaluated in the EIR and as preferred by the project sponsor would have the following unavoidable significant environmental impacts that could not be mitigated to a level of non-significance:
 - (a) The Project would exceed the BAAQMD threshold of significance for regional emissions of reactive organic gases (ROG). This is both an unmitigable project-level impact and an unmitigable cumulative impact.

CITY PLANNING COMMISSION

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- (b) The Project would have a significant unmitigable contribution to the 2015 adverse cumulative conditions on the U.S. 101 Freeway northbound on-ramp at Alemany Boulevard/Industrial Street; the U.S. 101 Freeway southbound on-ramp at Alemany Boulevard/Industrial Street; the U.S. 101 Freeway northbound on-ramp at Bayshore Boulevard/Cesar Chavez Street; the U.S. 101 Freeway southbound on-ramp at San Bruno Avenue; and the I-280 Freeway westbound on-ramp at Alemany Boulevard.

I hereby certify that the foregoing Motion was ADOPTED by the Planning Commission at its regular meeting of July 28, 2005.

Linda Avery
Commission Secretary

AYES: +4

NOES: -2

ABSENT: D. Alexander

ACTION: Certification of EIR

I. SUMMARY

A. INTRODUCTION

- This is the Environmental Impact Report (EIR) prepared in accordance with the California Environmental Quality Act (CEQA) for the proposed demolition of two vacant buildings at 491 Bayshore Boulevard /196 Loomis Street between Bayshore Boulevard and Loomis Street at Waterloo Street, and the construction of an approximately 153,089 square-foot (sq.-ft.) home improvement center and a separate parking garage for about 539 parking spaces.

An application for environmental evaluation for the Home Depot Project (the “Project”) was filed on January 23, 2001. On the basis of the Initial Study published on March 9, 2002, the San Francisco Planning Department determined that an EIR is required. (See Appendix A – Initial Study.) This EIR is intended to provide information on the environmental effects concerning the proposed 491 Bayshore Boulevard /196 Loomis Street Home Depot Project to allow the San Francisco Planning Commission to make an informed decision on the project.¹

B. PROJECT DESCRIPTION

The project site is a rectangular lot on the east side of Bayshore Boulevard and west side of Loomis Street in the northwest portion of the Bayview Hunters Point area of San Francisco, adjacent to the Bernal Heights neighborhood. The 249,699 sq.-ft. site (approximately 5.73 acres) currently contains two vacant buildings: an approximately 76,846 sq.-ft. former home improvement and building supply store (Goodman Lumber Company), and a former retail home furnishing and supply store

¹ A Preliminary Mitigated Negative Declaration was published on September 29, 2001, and appealed to the Planning Commission. Upon further analysis, the Planning Department determined that an Environmental Impact Report (EIR) was required. The issues raised in the appeals will be addressed in the EIR.

I. SUMMARY

(Whole Earth Access), at approximately 30,500 sq.ft. (total 107,346 sq.ft.). The site is relatively flat with a slight downward slope to the east.

- The project sponsor, Home Depot, proposes to construct a two-story, approximately 153,089 sq.-ft. home improvement center with approximately 96,250 sq.ft. on the main floor, 38,405 sq.ft. on the second floor, and an approximately 8,546 sq.-ft. outdoor garden center plus a 9,888 sq.-ft., enclosed greenhouse. An approximately 235,597 sq.-ft. parking garage consisting of two levels with rooftop parking totaling 539 parking spaces would also be constructed as a separate structure. The buildings would be approximately 40 feet in height. Vehicular access to the parking garage would be from Bayshore Boulevard, where Cortland Avenue dead-ends into Bayshore Boulevard, and secondary access would be on Loomis and Waterloo Streets. A customer pick-up lane would be provided on the ground level of the parking facility with egress onto Bayshore Boulevard, just north of the Cortland Avenue intersection. Four general freight-loading spaces would be provided. Traffic signals and pedestrian crosswalks would be installed at Bayshore Boulevard and Cortland Avenue, a left-turn pocket would be created for southbound Bayshore Boulevard traffic to enter the project site, the median on Bayshore Boulevard just north of the project site would be changed to allow northbound traffic to make U-turns, and the existing northbound left-turn pocket would be extended.

Following completion and certification of the Final EIR, the project would require the following approvals:

- Department of Public Works approval for curb cuts on Bayshore Boulevard and Loomis Street.
- Planning Department staff-initiated discretionary review before the Planning Commission.
- Department of Building Inspection approvals of demolition and building permits.
- Department of Parking and Traffic and the Interdepartmental Staff Committee on Traffic and Transportation (ISCOTT) approval for the installation of new traffic signals and pedestrian crosswalks at Bayshore Boulevard and Cortland Avenue, the creation and extension of north and south bound left-turn pockets on Bayshore Boulevard, and the change to the median on Bayshore Boulevard.
- Board of Supervisors approval of the southbound Bayshore left-turn pocket and changes to median on Bayshore Boulevard.

C. MAIN ENVIRONMENTAL EFFECTS

This EIR for the Project focuses on the issues of transportation and air quality. All other potential environmental effects were found to be at a less-than-significant level or to be mitigated to a less-than-significant level with mitigation measures to be implemented by the project sponsor. (Please see the Initial Study, included in this document as Appendix A, for analysis of other environmental issues.) In addition, this EIR discusses land use, zoning and general plan consistency, hazards, and cultural resources for informational purposes, although these impacts were found to be less-than-significant in the Initial Study.

Land Use, Zoning and General Plan Consistency (page 35)

The project site is within an M-1 (Light Industrial) Zoning District and a 65-J Height and Bulk District. The San Francisco *Planning Code* describes the M-1 District as providing lands for industrial development that, in general, are more suitable for smaller industries dependent upon truck transportation. In M-1 Districts, most industries are permitted, but some with particularly noxious characteristics are excluded. The permitted uses in M-1 Districts have certain requirements as to enclosure, screening and minimum distance from Residential Districts.

In January 2002, the Planning Commission established an Industrial Protection Zone Special Use District (IPZSUD) to protect and preserve production, distribution and repair land uses and activities from competing higher priced land uses and activities in some parts of the City. The proposed project site is within the IPZSUD, and the project would be a permitted use.

The project site is in the northwest portion of the Bayview Hunters Point neighborhood, near the eastern border of the Bernal Heights neighborhood. The buildings in the general area range from one to two stories, are large in mass/bulk, with a mix of commercial activity, both industrial and retail in character. Some of the uses located immediately adjacent to the project site include fast food, grocery, home improvement, auto body repair, and warehouse. In the vicinity of the project site, U.S. 101 has north- and southbound off-ramps at Silver Avenue, and I-280 has on- and off-ramps west of Alemany Boulevard/Industrial Street. U.S. 101 and I-280 merge at Cesar Chavez Street just south of the project site at the Alemany interchange.

I. SUMMARY

The proposed project would be a large development containing some of the previous uses on the site, and would increase the density of uses, number of customers and amount of vehicles on the site. The proposed project, however, would not essentially change the existing retail/light industrial character or physical arrangement of the area. The use would be generally compatible with the mix of surrounding commercial and industrial uses in a dense urban area.

Transportation (page 42)

The transportation study performed for the proposed project reviewed conditions at five freeway on-ramps and fourteen key intersections (signalized and stop-sign controlled) in the vicinity of the project site. During the weekday PM peak hour, four of the five study freeway on-ramps operate at LOS C. However, the I-280 westbound on-ramp from Alemany Boulevard currently operates at LOS F due to the high volume of commute traffic exiting San Francisco during this time period. During the Saturday midday peak hour, four of the five study freeway on-ramps operate at LOS B or C. The U.S. 101 northbound on-ramp from Bayshore/Cesar Chavez, however, currently operates at LOS F due to high traffic volumes on the freeway and the general traffic congestion on U.S. 101/I-80 through downtown San Francisco.

During the weekday PM peak hour, all signalized intersections operate with acceptable operating conditions (LOS D or better). In addition, at the four STOP-controlled intersections, the worst STOP-controlled approaches all operate with acceptable conditions. During the Saturday midday peak hour, all signalized intersections and all worst approaches at the STOP-controlled intersections operate at LOS D or better.

Overall, the proposed project would generate 848 vehicle-trips during the weekday PM peak hour (generally 5:00 to 6:00 p.m.), of which 409 vehicle-trips would be inbound to the site and 439 vehicle-trips would be outbound from the site. During the Saturday midday peak hour (primarily 12:00 to 1:00 p.m.), the proposed project would generate about 1,268 vehicle-trips, of which 657 vehicle-trips would be inbound and 611 vehicle-trips would be outbound. During the weekday peak hour of activity (usually in the midday), the proposed project would generate about 1,060 vehicle-trips, of which 551 vehicle-trips would be inbound and 509 vehicle-trips would be outbound.

The addition of the vehicle-trips generated by the proposed project would not change the operating conditions at the study locations for either the weekday PM peak hour or the Saturday midday peak hour analyses. All analysis freeway on-ramps would continue to operate at the same levels of service as under existing conditions.

Although the overall levels of service would remain similar, the increase in vehicles destined to and from the proposed project would result in a moderate increase in delay at individual movements at several study intersections. As such, vehicles making these movements may experience somewhat higher delays than vehicles at the intersection as a whole, but these impacts would not be enough to constitute significant impacts. The increase in delay at these individual movements would not result in the intersection operating at unacceptable service levels. In addition, the proposed project would also result in increases in traffic volumes at several movements at the study intersections. The increased volume would not increase the average delay per vehicle at the individual movements or the intersections as a whole.

To supplement the analysis of the intersection operating conditions, a queuing analysis was performed for the weekday PM peak hour, the weekday midday peak hour, and the Saturday midday peak hour of activity at the intersection of Bayshore/Cortland, where the main project driveway would be located. At the southbound left-turn from Bayshore Boulevard to the project driveway, average queues would be about 50 to 100 feet long. As a result, the proposed left-turn pocket of 180 feet would be sufficient to accommodate the left-turning queues.

At the northbound left-turn from Bayshore Boulevard to westbound Cortland Avenue, the pocket is about 140 feet long. On average, the queues that would develop as a result of the project could still be accommodated within the existing pocket. There would be times, however, that the queues would extend past the existing pocket, potentially affecting operations of the adjacent northbound through lane. To reduce this potential, as part of the project, the northbound left-turn pocket would be extended by at least 70 feet (to a total length of 210 feet) by carving additional length from the center concrete island.

At the eastbound approach of Cortland Avenue to Bayshore Boulevard, the maximum queues that currently develop extend about 105 to 160 feet (up to the U.S. 101 overpass). With the proposed

I. SUMMARY

project, the addition of project-related traffic and adjustments to the signal timing would result in the lengthening of the eastbound queue. Without improvement measures for changes on Cortland Avenue, the average queues would be about 185 feet during the weekday PM peak hour and 275 feet during the Saturday midday peak hour (both of which would extend underneath the U.S. 101 overpass). The 95th percentile queues would be about 210 feet long during the weekday midday peak hour of activity, 305 feet during the weekday PM peak hour and 460 feet during the Saturday midday peak hour. This 95th percentile queue during the Saturday midday peak hour would extend to the intersection of Cortland/Peralta.

The proposed project would generate relatively few transit trips on weekdays and weekends, as transit trips to and from the proposed project would generally be limited to employees or customers from the nearby area. As such, there is not anticipated to be an adverse increase in the number of riders on the adjacent transit lines as a result of the proposed project.

- The proposed project would be required to provide 503 off-street parking spaces per the San Francisco *Planning Code*. In addition, the proposed project would have a maximum parking demand (for both customers and employees) of 502 spaces during the weekday midday peak period and 539 spaces during the weekend midday peak period. Since the proposed project would include 539 parking spaces, it would meet the *Planning Code* requirements and meet the anticipated parking demand.

Due to the nature of Home Depot business, it is not anticipated that many customers would walk to access the proposed project, although some employees may walk to and from work. As such, with the development of the proposed project, the number of pedestrian trips would only slightly increase in the nearby vicinity. The anticipated increase in additional pedestrians in the area could be accommodated on the existing sidewalks and crosswalks. As these facilities currently have relatively low pedestrian volumes, pedestrian conditions would continue to remain acceptable.

Based on information from a similar Home Depot store, it was estimated that the proposed project would generate 30 daily delivery trips per day (approximately 15 semi tractor-trailers and 15 small trucks/vans). The Project Sponsor has estimated that there would be a peak demand for four loading docks (two long-term and two short-term) at the proposed project. The San Francisco *Planning Code* requires that the proposed project provide four off-street loading spaces. The proposed project would

provide four loading docks in an area located at the northeast corner of the site, plus a separate customer loading area. As such, the proposed supply of four loading docks would meet the anticipated demand and *Planning Code* requirements.

Project construction is expected to take about 16 months, with staging of most construction equipment and materials occurring within the project site and on Loomis Street, and would have minimal impact on other adjacent streets. Throughout the construction period, there would be a flow of construction-related trucks into and out of the site. During the peak construction period, there are estimated to be 30 to 40 workers per day at the site. It is anticipated that the addition of worker-related vehicle or transit trips would not substantially affect the transportation conditions. It is expected that the Muni bus stop located on Bayshore Boulevard directly in front of the vacant Goodman Lumber building may need to be temporarily relocated during some construction phases of the proposed project. During these times, if it were determined that a temporary Muni bus stop relocation would be needed, it would be coordinated with the Muni Street Operations/Special Events office.

By the year 2015, cumulative traffic would result in an increase in congestion on U.S. 101, I-280 and the nearby on-ramps. The increase in cumulative traffic would cause all five study on-ramp locations to operate at LOS F during the weekday PM peak hour and two of the on-ramp locations to operate at LOS F during the Saturday midday peak hour. At these locations, there would be the potential for frequent breakdowns to occur along the freeway, and for substantial queues to form on the on-ramps due to the volume of traffic on the freeway. The new vehicle-trips generated by the proposed project would contribute to the poor operating conditions at the LOS F on-ramps.

To alleviate poor operating conditions on U.S. 101, I-280 and the study on-ramps, additional freeway mainline capacity would be needed. In general, the provision of additional lanes on the on-ramps, or individual on-ramp improvements (such as wider shoulders or longer acceleration lanes) would not allow for more vehicles to enter the freeway without additional improvements to the freeway mainlines. Likewise, the implementation of ramp-metering would not improve on-ramp operations, since metering reduces the traffic volumes that can enter the freeway. Consequently, the proposed project's contribution to the poor on-ramp conditions would be considered a significant unavoidable cumulative impact.

I. SUMMARY

For the cumulative traffic conditions in the year 2015, the weekday PM peak hour and the Saturday midday peak hour study intersections would all operate acceptably (LOS D or better), except the intersection of Mission/Cortland, which would operate at LOS F.

Under 2015 cumulative conditions, the Mission/Cortland intersection would operate at LOS F during both the weekday PM peak hour and Saturday midday peak hour. The poor operating conditions would be due to the increase in overall cumulative traffic volumes at the intersection, which would make it difficult for vehicles to turn left from southbound Mission Street to Cortland Avenue. The project's contribution to this adverse condition would be significant. However, operations of this left turn movement could be improved by creating a left-turn only phase in the traffic signal plan (left-turns would still be permitted during the northbound/southbound phase). With this mitigation measure, the intersection would operate at LOS C during the weekday PM peak hour and LOS D during the Saturday midday peak hour.

Air Quality (page 81)

Air quality impacts would result from project construction and operation. Construction emissions, primarily dust generated by earthmoving activities and criteria air pollutants emitted by construction vehicles, would have a short-term effect on air quality. Operational emissions, generated by project-related traffic and by combustion of natural gas for building space and water heating, would affect air quality throughout the lifetime of the project. Transportation sources, such as project-generated vehicles, would account for over 90 percent of operational project-related emissions. Stationary source emissions would be less-than-significant.

Carbon monoxide (CO) concentrations were modeled for project-generated traffic at the four nearby intersections that meet the Bay Area Air Quality Management District criteria. The predicted one-hour and eight-hour averaged CO concentrations would be below the applicable state/federal standards. Therefore, impacts on local air quality would be less than significant.

Regional emissions from auto travel of reactive hydrocarbons and oxides of nitrogen (two precursors of ozone), and PM₁₀ (particulate matter, 10 micron) can affect regional air quality outside the project vicinity. The project-generated increase in vehicle emissions would exceed the BAAQMD threshold

of significance for emissions of reactive organic gases (ROG), and would be considered to have a significant adverse environmental effect on regional air quality.

Project impacts related to toxic air contaminants (diesel exhaust particulate) would be well below the BAAQMD thresholds of significance and would be less-than-significant.

Hazardous Materials (page 93)

Lead concentrations and chromium exceeding the hazardous waste threshold were detected in the subsurface soil at the site. The presence of lead and chromium contamination could present a health risk to construction workers if not properly handled during excavation. In addition, chromium and lead-impacted soil that is excavated from the site could present substantial human health risks if improperly disposed or reused in areas that may result in human contact. Mitigation would consist of the removal of hazardous substances and their disposal at an approved disposal site, or other appropriate mitigation. Site Mitigation Plans (SMP) have been submitted to the appropriate city or federal agencies and would be revised before a building permit is issued. Compliance with an approved SMP and existing regulations would reduce any potential impacts related to contaminated soil or groundwater to a less-than-significant level.

The existing buildings on the project site were constructed in the 1950s and 1960s, a period of time when asbestos was used in buildings. Asbestos materials may be found within the existing structures on site that are proposed to be demolished as part of the project. All asbestos identified must be removed and properly disposed of prior to demolition of the buildings. Regulations and procedures already established as part of the permit review process would ensure that any potential impacts due to asbestos would be reduced to a less-than-significant impact.

Demolition of the existing buildings could create exposure to lead-based paint. These materials could expose workers and persons in close proximity, including off-site locations. Compliance with procedures required as part of the *San Francisco Building Code* would ensure that potential impacts due to lead-based paint would be reduced to a less-than-significant level.

Improper handling or disposal of discarded equipment (i.e., fluorescent light fixtures) in the existing buildings could result in human or environmental exposure to liquid material containing PCBs.

I. SUMMARY

Adherence to standard precautionary measures would reduce the potential hazards associated with PCB exposure to a less-than-significant level.

Due to the presence of contaminated soil, there may be localized areas of groundwater contamination on the site that would have to be removed (dewatered) during excavation of the project. Adherence to the San Francisco Industrial Waste Ordinance would minimize public health exposure to hazardous materials present in the dewatering discharge and reduce potential impacts to a less-than-significant level.

Based on the above, with mitigation, the proposed project would not result in significant impacts related to hazardous materials located on the project site.

Cultural Resources (page 101)

The project site is generally situated in what was, prior to the arrival of the first Europeans, the northwestern portion of the territory occupied by the Costanoan people, a Native American group also referred to in anthropological literature as the Ohlone. The natural setting of the project site, situated amidst the salt-marshes surrounding Islais Creek on the interface of the wet and dry environmental zones, was a generally favorable environmental setting for the encampments of aboriginal hunters and gatherers. Although no prehistoric/protohistoric resources are known to exist on the project site, numerous archeological sites have been recorded in the Islais Creek region.

As far as can be determined from historical records, the area surrounding and including the project site remained in a completely natural state throughout the Spanish/Mexican and Gold Rush eras. The marshy tract that characterized much of the project area and Islais Creek neighborhood was finally transformed into buildable land by the first half of the 20th Century. It was not until the 1950s that a number of industries and businesses began to occupy this area.

Given the multiplicity of documented, prehistoric deposits in the project area, the project site should be deemed a zone of high prehistoric/protohistoric archeological sensitivity and a mitigation measure is necessary to reduce the project's potential impact on subsurface cultural resources to a level of insignificance.

Growth Inducement (page 103)

- The proposed project would replace two existing buildings, totaling 107,372 sq.ft., with an approximately 153,089 sq.-ft. home improvement store and a 539-space parking garage. This would intensify the use of the site, but would not be expected to substantially alter development patterns in the northwest Bayview Hunters Point area or elsewhere in San Francisco. The project site is in an urbanized area that is intensively developed and that already supports substantial amounts of light industrial, warehouse, commercial, and residential development in surrounding blocks.
- The addition of the home improvement store and parking garage would increase the daily population on the project site by approximately 2,500 to 3,300 people. This daily population would consist of approximately 175 to 197 employees and as many as 2,500 to 3,000 shoppers per day. It is anticipated that most of the new employees would already reside in San Francisco, while some employees from outside the City may seek housing within the City boundaries. The number of on-site employees relocating from outside San Francisco would be small in proportion to San Francisco's overall population, and would not represent a substantial growth in population or concentration in the neighborhood, City, or region.

The proposed project is located in an urban area and would not necessitate or induce the extension of municipal infrastructure. The project may induce commercial growth in the area, but such growth would be part of the planned growth for the City. Therefore, the proposed project would not have a significant effect on growth inducement.

D. MITIGATION MEASURES (page 105)

MEASURES THAT WOULD BE IMPLEMENTED BY PUBLIC AGENCIES

Transportation

- In the year 2015, the cumulative conditions at the Mission Street/Cortland Avenue intersection would operate at LOS F during both the weekday PM peak hour and Saturday midday peak hour. The poor operating conditions would be due to the increase in overall traffic volumes at the intersection, making it difficult for vehicles to turn left from southbound Mission Street to Cortland Avenue. The project's contribution to this adverse condition would be significant, however, operations of this left turn movement could be improved by creating a left-turn phase (left-turns would be permitted during the northbound/southbound phase, but would have their own protected left turn phase as well).

I. SUMMARY

With this mitigation measure, the intersection would operate at LOS C during the weekday PM peak hour and LOS D during the Saturday midday peak hour. The project sponsor would pay for the costs of this measure.

MEASURES PROPOSED AS PART OF THE PROJECT

Construction Air Quality

The project sponsor shall require the construction contractor(s) to spray the project site with water during excavation, grading, and site preparation activities; spray unpaved construction areas with water at least twice per day; cover stockpiles of soil, sand, and other such material; cover trucks hauling debris, soils, sand or other such material; and sweep surrounding streets during these periods at least once per day to reduce particulate emissions. Ordinance 175-91, passed by the Board of Supervisors on May 6, 1991, requires that non-potable water be used for dust control activities. Therefore, the project sponsor shall require the construction contractor(s) to obtain reclaimed water from the Clean Water Program for this purpose.

The project sponsor shall require the project contractor(s) to maintain and operate construction equipment so as to minimize exhaust emissions of particulates and other pollutants, by such means as prohibiting idling motors when equipment is not in use or when trucks are waiting in queues, and implementing specific maintenance programs to reduce emissions for equipment that would be in frequent use for much of the construction period.

In addition to the standard mitigation procedures above, the following additional measures shall be implemented due to proximity of a sensitive receptor (the Montessori School on Loomis and Industrial Streets):

- Contractors will suspend dust-producing activities when wind (instantaneous gusts) exceeds 25 mph.
- The project sponsor will require the construction contractor to designate a dust-control coordinator who will respond to dust complaints. This person's name and phone number will be posted prominently on the project site and provided to the Big City Montessori School. This person shall respond to complaints within 24-hours or less and shall have the authority to take corrective action.
- Watering will be used to control dust generation during demolition of structures and break-up of pavement.
- Dust-proof chutes to load debris into trucks will be used whenever feasible.

Hazards

The project sponsor shall follow the mitigation measures delineated and described in the William Dubovsky Environmental Site Mitigation Plan, SGI's Amended Site Mitigation Plan, and comply with the requirements set forth in DPH's letters dated June 11, 2001 and August 9, 2001, and any further guidelines and revisions set by the DPH, including the

implementation of the Health and Safety Plan (HSP). The project sponsor must take the following actions prior to approval and issuance by the San Francisco Planning Department of the building permit application for construction of the new buildings on the project site.

Preparation of Revised Site Mitigation Plan

Based on the results of the Phase II Environmental Site Assessment (ESA) soil tests, Environmental Health Management Section-Hazardous Waste Unit (EHS-HWU) determined the soils on the project site are contaminated with lead, petroleum hydrocarbons, total chromium, or other materials associated with previous businesses on the site. The project sponsor shall submit a detailed Project Construction/Excavation Plan and a revised Site Mitigation Plan (SMP) to EHS-HWU at 1390 Market Street, Suite 822, San Francisco, California 94102 for review and approval.

The revised SMP shall include a discussion of the level of contamination of soils on the project site by petroleum hydrocarbons, lead, total chromium or other hazardous materials and implementation measures for managing contaminated soils on the site, including, but not limited to: 1) the removal of the contaminated soils; and 2) the specific practices to be used to handle, haul, and dispose of contaminated soils on the site, including, but not limited to, the measures listed below.

Preparation of a Revised Health and Safety Plan

The project sponsor shall submit a revised Health and Safety Plan (HSP), prepared in accordance with State of California Occupational Safety and Health Administration Guidelines, to the San Francisco Department of Public Health, Environmental Health Management Section- Hazardous Waste Unit (EHS-HWU) at 1390 Market Street, Suite 822, San Francisco, California 94102 for review, approval, and implementation. The HSP shall be prepared by a Health and Safety Officer certified by the State of California. The HSP shall contain an analysis of potential hazards on the project site, including exposure petroleum hydrocarbons, or other hazardous materials associated with gas and oil facility, that may be encountered by workers on the project site; and precautions to mitigate the potential hazards. As noted in the Amended SMP submitted by the project sponsor to EHS-HWU, an HSP shall be submitted at least two weeks prior to commencement of any redevelopment site work.

Handling, Hauling, and Disposal of Contaminated Soils

(a) specific work practices: If the project sponsor assumes that the soils on the project site are contaminated with lead, total chromium, petroleum hydrocarbons, or other hazardous materials associated with gas and oil facility at or above potentially hazardous levels; or if, based on the results of the soil tests conducted, DPH determines that the soils on the project site are contaminated with lead, total chromium, petroleum hydrocarbons, or other hazardous materials at or above potentially hazardous levels, the construction contractor shall be alert for the presence of such soils during excavation and other construction activities on the site (detected through soil odor, color, and texture and results of on-site soil testing), and shall be prepared to handle, profile (i.e., characterize), and dispose of such soils appropriately (i.e., as dictated by local, state, and federal regulations, including Cal-OSHA safe work practices) if and when such soils are encountered on the site.

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(b) dust suppression: The construction contractor shall keep soils exposed during excavation for site preparation and project construction moist throughout the time they are exposed, both during and after work hours.

(c) surface water runoff control: Where soils are stockpiled, the construction contractor shall use visqueen to create an impermeable liner, both beneath and on top of the soils, with a berm to contain any potential surface water runoff from the soil stockpiles during inclement weather.

(d) soils replacement: If necessary, the construction contractor shall use clean fill or other suitable material(s) to bring portions of the project site, where contaminated soils have been excavated and removed, up to construction grade.

(e) hauling and disposal: The construction contractor shall haul contaminated soils off the project site by waste hauling trucks appropriately certified with the State of California and adequately covered to prevent dispersion of the soils during transit, and shall dispose of contaminated soils at a permitted hazardous waste disposal facility registered with the State of California or other appropriate agency.

Preparation of Closure/Certification Report

After excavation and foundation construction activities are completed, the project sponsor shall prepare and submit a closure/certification report to the San Francisco Department of Public Health, Environmental Health Management Section-Hazardous Waste Unit (EHS-HWU) for review and approval at 1390 Market Street, Suite 822, San Francisco, California 94102. The closure/certification report shall include the mitigation measures in the SMP for handling and removing contaminated soils from the project site, whether the construction contractor modified any of these mitigation measures, and how and why the construction contractor modified those mitigation measures.

Deed Recordation on Remaining Contaminated Soils

If potentially hazardous levels of petroleum hydrocarbons, lead, total chromium or other hazardous materials associated with gas and oil facility remain in soils on the project site after project construction and if both of the following circumstances are met, the project sponsor shall file a recordation on the deed for the subject property that indicates the need to take special precautions during future disturbance of the soils on the property due to certain on-site soil conditions:

(a) The project sponsor assumes that the soils on the project site are contaminated with lead, total chromium or petroleum hydrocarbons at or above potentially hazardous levels; *OR* based on the results of the soil tests conducted, DPH determines that the soils on the project site are contaminated with lead, total chromium or petroleum hydrocarbons at or above potentially hazardous levels; *and*

(b) Potentially hazardous levels of lead, total chromium or petroleum hydrocarbons remain in soils on the project site.

● Cultural Resources

Based on a reasonable presumption that archeological resources may be present within the project site, the following measures shall be undertaken to avoid any potentially significant adverse effect from the proposed project on buried or submerged historical resources. The project sponsor shall retain the services of a qualified archeological consultant having expertise in California prehistoric and urban historical archeology. The archeological consultant shall undertake an archeological testing program as specified herein. In addition, the consultant shall be available to conduct an archeological monitoring and/or data recovery program if required pursuant to this measure. The archeological consultant's work shall be conducted in accordance with this measure at the direction of the Environmental Review Officer (ERO). All plans and reports prepared by the consultant as specified herein shall be submitted first and directly to the ERO for review and comment, and shall be considered draft reports subject to revision until final approval by the ERO. Archeological monitoring and/or data recovery programs required by this measure could suspend construction of the project for up to a maximum of four weeks. At the direction of the ERO, the suspension of construction can be extended beyond four weeks only if such a suspension is the only feasible means to reduce to a less-than-significant level potential effects on a significant archeological resource as defined in CEQA *Guidelines* Section 15064.5 (a)(c).

Archeological Testing Program. The archeological consultant shall prepare and submit to the ERO for review and approval an archeological testing plan (ATP). The archeological testing program shall be conducted in accordance with the approved ATP. The ATP shall identify the property types of the expected archeological resource(s) that potentially could be adversely affected by the proposed project, the testing method to be used, and the locations recommended for testing. The purpose of the archeological testing program will be to determine to the extent possible the presence or absence of archeological resources and to identify and to evaluate whether any archeological resource encountered on the site constitutes an historical resource under CEQA.

At the completion of the archeological testing program, the archeological consultant shall submit a written report of the findings to the ERO. If based on the archeological testing program the archeological consultant finds that significant archeological resources may be present, the ERO in consultation with the archeological consultant shall determine if additional measures are warranted. Additional measures that may be undertaken include additional archeological testing, archeological monitoring, and/or an archeological data recovery program. If the ERO determines that a significant archeological resource is present and that the resource could be adversely affected by the proposed project, at the discretion of the project sponsor either:

- A) The proposed project shall be re-designed so as to avoid any adverse effect on the significant archeological resource; or
- B) A data recovery program shall be implemented, unless the ERO determines that the archeological resource is of greater interpretive than research significance and that interpretive use of the resource is feasible.

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Archeological Monitoring Program. If the ERO in consultation with the archeological consultant determines that an archeological monitoring program shall be implemented the archeological monitoring program shall minimally include the following provisions:

- The archeological consultant, project sponsor, and ERO shall meet and consult on the scope of the AMP reasonably prior to any project-related soils disturbing activities commencing. The ERO in consultation with the archeological consultant shall determine what project activities shall be archeologically monitored. In most cases, any soils-disturbing activities, such as demolition, foundation removal, excavation, grading, utilities installation, foundation work, driving of piles (foundation, shoring, etc.), site remediation, etc., shall require archeological monitoring because of the risk these activities pose to potential archeological resources and to their depositional context;
- The archeological consultant shall advise all project contractors to be on the alert for evidence of the presence of the expected resource(s), of how to identify the evidence of the expected resource(s), and of the appropriate protocol in the event of apparent discovery of an archeological resource;
- The archeological monitor(s) shall be present on the project site according to a schedule agreed upon by the archeological consultant and the ERO until the ERO has, in consultation with project archeological consultant, determined that project construction activities could have no effects on significant archeological deposits;
- The archeological monitor shall record and be authorized to collect soil samples and artifactual/ecofactual material as warranted for analysis;
- If an intact archeological deposit were encountered, all soils-disturbing activities in the vicinity of the deposit shall cease. The archeological monitor shall be empowered to temporarily redirect demolition/excavation/pile driving/construction activities and equipment until the deposit is evaluated. If in the case of pile driving activity (foundation, shoring, etc.), the archeological monitor has cause to believe that the pile driving activity may affect an archeological resource, the pile driving activity shall be terminated until an appropriate evaluation of the resource has been made in consultation with the ERO. The archeological consultant shall immediately notify the ERO of the encountered archeological deposit. The archeological consultant shall make a reasonable effort to assess the identity, integrity, and significance of the encountered archeological deposit, and present the findings of this assessment to the ERO. Whether or not significant archeological resources are encountered, the archeological consultant shall submit a written report of the findings of the monitoring program to the ERO.

Archeological Data Recovery Program. The archeological data recovery program shall be conducted in accord with an archeological data recovery plan (ADRP). The archeological consultant, project sponsor, and ERO shall meet and consult on the scope of the ADRP prior to preparation of a draft ADRP. The archeological consultant shall submit a draft ADRP to the ERO. The ADRP shall identify how the proposed data recovery program will preserve the significant information the archeological resource is expected to contain. That is, the

ADRP will identify what scientific/historical research questions are applicable to the expected resource, what data classes the resource is expected to possess, and how the expected data classes would address the applicable research questions. Data recovery, in general, should be limited to the portions of the historical property that could be adversely affected by the proposed project. Destructive data recovery methods shall not be applied to portions of the archeological resources if nondestructive methods are practical.

The scope of the ADRP shall include the following elements:

- *Field Methods and Procedures.* Descriptions of proposed field strategies, procedures, and operations.
- *Cataloguing and Laboratory Analysis.* Description of selected cataloguing system and artifact analysis procedures.
- *Discard and Deaccession Policy.* Description of and rationale for field and post-field discard and deaccession policies.
- *Interpretive Program.* Consideration of an on-site/off-site public interpretive program during the course of the archeological data recovery program.
- *Security Measures.* Recommended security measures to protect the archeological resource from vandalism, looting, and nonintentionally damaging activities.
- *Final Report.* Description of proposed report format and distribution of results.
- *Curation.* Description of the procedures and recommendations for the curation of any recovered data having potential research value, identification of appropriate curation facilities, and a summary of the accession policies of the curation facilities.

Human Remains and Associated or Unassociated Funerary Objects. The treatment of human remains and of associated or unassociated funerary objects discovered during any soils disturbing activity shall comply with applicable State and Federal laws. This shall include immediate notification of the Coroner of the City and County of San Francisco and in the event of the Coroner's determination that the human remains are Native American remains, notification of the California State Native American Heritage Commission (NAHC), which shall appoint a Most Likely Descendant (MLD) (Public Resource Code Section 5097.98). The archeological consultant, project sponsor, and MLD shall make all reasonable efforts to develop an agreement for the treatment of, with appropriate dignity, human remains and associated or unassociated funerary objects (CEQA *Guidelines*, Section 15064.5(d)). The agreement should take into consideration the appropriate excavation, removal, recordation, analysis, custodianship, curation, and final disposition of the human remains and associated or unassociated funerary objects.

Final Archeological Resources Report. The archeological consultant shall submit a Draft Final Archeological Resources Report (FARR) to the ERO that evaluates the historical significance of any discovered archeological resource and describes the archeological and historical research methods employed in the archeological testing/monitoring/data recovery program(s) undertaken. Information that may put at risk any archeological resource shall be provided in a separate removable insert within the final report.

I. SUMMARY

Once approved by the ERO, copies of the FARR shall be distributed as follows: California Archeological Site Survey Northwest Information Center (NWIC) shall receive one (1) copy and the ERO shall receive a copy of the transmittal of the FARR to the NWIC. The Major Environmental Analysis division of the Planning Department shall receive three copies of the FARR along with copies of any formal site recordation forms (CA DPR 523 series) and/or documentation for nomination to the National Register of Historic Places/California Register of Historical Resources. In instances of high public interest in or the high interpretive value of the resource, the ERO may require a different final report content, format, and distribution than that presented above.

IMPROVEMENT MEASURES

- Improvement measures diminish effects of the project that were found through the environmental analysis to be less-than-significant impacts. The following measure would be implemented by the Department of Parking and Traffic, and the cost would be borne by the project sponsor.

Transportation

- In 2015, the cumulative conditions at the Bayshore Boulevard and Silver Avenue intersection would operate at LOS D during the weekday PM peak hour, although the northbound left-turn movement would operate at LOS F, the resulting queue would extend past the left-turn pocket. The proposed project would not significantly contribute to the cumulative conditions. To improve operations, a protected northbound left-turn phase could be established (under the existing signalization plan for the intersection, the northbound and southbound left-turns are permitted, not protected), and the cycle length could be increased from 75 seconds to 90 seconds. These improvements would be appropriate independent of the project under existing conditions and would be designed to mitigate cumulative significant impacts to which the project would not make a significant contribution. The overall intersection operating conditions during the weekday PM peak hour would remain at LOS D, but the northbound left-turn operations would improve and the average delay per vehicle would decrease. Assuming the protected left-turn phase would be established at other times, the intersection would operate at LOS C during the Saturday midday peak hour.

E. SIGNIFICANT IMPACTS (page 113)

The proposed project, with mitigation, would have the following unavoidable significant impacts in the areas of air quality and traffic:

- The proposed project would exceed the BAAQMD threshold of significance for regional emissions of reactive organic gases (ROG). This is an unmitigable project level and cumulative impact.

- The proposed project would have a significant unmitigable contribution to the 2015 adverse cumulative conditions on the U.S. 101 Freeway northbound on-ramp at Alemany Boulevard/Industrial Street; the U.S. 101 Freeway southbound on-ramp at Alemany Boulevard/Industrial Street; the U.S. 101 Freeway northbound on-ramp at Bayshore Boulevard/Cesar Chavez Street; the U.S. 101 Freeway southbound on-ramp at San Bruno Avenue; and the I-280 Freeway westbound on-ramp at Alemany Boulevard.

F. ALTERNATIVES TO THE PROPOSED PROJECT

(page 115)

Alternative A: No Project

This alternative would entail no change to the site, which would remain in its existing condition. The No Project Alternative would not have any of the impacts of the proposed project, including the potentially significant air quality impacts of the proposed project and the contribution to the 2015 cumulative traffic conditions on the northbound U.S. 101 Freeway on-ramp at Alemany Boulevard/Industrial Street; the northbound U.S. 101 Freeway on-ramp at Bayshore Boulevard/Cesar Chavez Street, the southbound U.S. 101 Freeway on-ramp at San Bruno Avenue, and the westbound I-280 Freeway on-ramp at Alemany Boulevard.

Alternative B: Variant No Project

This alternative represents one possibility of what could be expected if the proposed project were not approved. The two existing buildings on site would be reused for retail/commercial uses as permitted by zoning. The former Goodman Lumber Company building is about 76,846 sq.ft., and the previous Whole Earth Access supply store is approximately 30,500 sq.ft., for a total of approximately 107,400 sq.ft. Both buildings are about 23 feet high. In this alternative, the retail/commercial uses would presumably be one or two large-scale enterprises similar to the previous uses on the site and/or proposed uses for the site. In addition, the buildings would be brought up to building code.

Compared to the proposed project, the Variant No Project Alternative, because of the smaller size, would have less intensive environmental effects on transportation and parking, population, shadows, construction noise, air quality, utilities and public services, and energy/natural resources. This alternative would generate about 552 vehicle trips in the weekday PM peak hour and 789 trips in the

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Saturday midday peak hour,² compared to proposed project's 848 weekday PM peak hour trips and 1,268 trips in the Saturday midday peak hour. The operating conditions of the study intersections would be better than with the proposed project. The impacts of both the proposed project and this alternative on transit, parking, pedestrians, bicycles, construction traffic, and contribution to total cumulative traffic volumes would be less-than-significant. This alternative would make a smaller contribution to the growth in cumulative traffic impacts at nearby intersections than would the proposed project, however, it would still have a significant contribution (more than five percent increase) to the 2015 cumulative conditions on the northbound U.S. 101 Freeway on-ramp at Alemany Boulevard/Industrial Street; the southbound U.S. 101 Freeway on-ramp at Alemany Boulevard/Industrial Street; the northbound U.S. 101 Freeway on-ramp at Bayshore Boulevard/Cesar Chavez Street, the southbound U.S. 101 Freeway on-ramp at San Bruno Avenue, and the westbound I-280 Freeway on-ramp at Alemany Boulevard. Under this alternative, the Mission/Cortland intersection would operate at LOS F under the 2015 cumulative conditions.

In those environmental areas not governed by height or bulk, this alternative would have effects similar to the proposed project on land use, noise, biology, energy, natural resources, utilities and public services, geology/topography, hydrology, and the potential presence of hazardous materials in the existing buildings. It is assumed that this alternative would have minimal effects on archeological cultural resources as there would be no need for excavation. In Alternative B, the current buildings would be reused and there would be little change in the existing visual character of the site. The hazardous materials in the soil would remain.

Alternative B would not have a significant impact on air quality, unlike the proposed project. The effect on regional air quality emissions of reactive organic gases (ROG) would be below the BAAQMD threshold for significance. Alternative B would generate a smaller increase in employment and daily population than the proposed project. The population effects of both this alternative and the proposed project would be less-than-significant.

² Based on an estimate of 13.5 person trips per 1,000 sq.ft. of retail for Weekday PM peak hour, and 19.3 person trips per 1,000 sq.ft. of retail space for Saturday midday per the San Francisco Planning Department, *Interim Transportation Impacts Analysis Guidelines for Environmental Review*, January 2000.

Alternative B would not meet most of the project sponsor's objectives of developing a standard size Home Depot home improvement store for San Francisco.

Alternative C: A 60,000-Square-Foot Project

This alternative is included in response to comments made on the Initial Study that requested an analysis of a home improvement store smaller than the previous 76,846 sq.-ft. Goodman Lumber store. The existing buildings on the site would be demolished, and a one-story approximately 60,000 sq.-ft. home improvement store would be constructed with a surface parking lot containing approximately 350 parking spaces.

Compared to the proposed project, a 60,000 sq.-ft. alternative, because of its smaller size, would have less intensive environmental effects on visual quality and urban design, transportation and parking, construction noise, air quality, utilities and public services, and energy/natural resources. In those environmental areas not governed by height or bulk, this alternative would have similar effects on land use, operational noise, biology, geology/topography, water, hazards, and cultural resources. This alternative would generate peak-hour vehicle trips that would be about forty percent of those generated by the proposed project.

The impacts of this alternative on intersection levels of service, transit, parking, pedestrians, bicycles, construction traffic, and contribution to total cumulative traffic volumes would be less-than-significant, except for the contribution to the 2015 cumulative conditions on the northbound U.S. 101 Freeway on-ramp at Alemany Boulevard/Industrial Street, the southbound U.S. 101 Freeway on-ramp at Alemany Boulevard/Industrial Street, the southbound U.S. 101 Freeway on-ramp at San Bruno Avenue, and the westbound I-280 Freeway on-ramp at Alemany Boulevard, all of which would be significant, unavoidable cumulative impacts. The trip contribution of the 60,000 sq.-ft. alternative to the northbound U.S. 101 Freeway on-ramp at Bayshore Boulevard/Cesar Chavez Street would be less-than-significant. This alternative would make a smaller contribution to the growth in cumulative traffic impacts at nearby intersections than would the proposed project. Under this alternative, the Mission/Cortland intersection would operate at LOS F under the 2015 cumulative conditions.

This alternative would be environmentally superior to the proposed project and the other alternatives discussed below. This alternative would not meet the project sponsor's objectives of developing a

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standard size Home Depot home improvement store for San Francisco, offering a full range of home improvement items and services.

Alternative D: A 107,400-Square-Foot Project

This alternative would be a Home Depot store similar to the proposed project in terms of building exterior and parking garage, however, there would be no mezzanine and the total square footage would be approximately 107,400 sq.ft., about 45,690 sq.ft. less than the proposed project (a reduction of approximately thirty percent). The parking garage would have about 385 parking spaces on two levels (about 165 spaces fewer than the proposed project). The building exterior in this alternative would be similar to the proposed project.

- Most of the potential impacts identified for the proposed project would occur with Alternative D, but at a lower level. This alternative would still demolish the two existing vacant buildings and replace them with a new retail building, garden center, greenhouse and parking garage. Thus, the change in land use would be the same, but the size and resultant population density of this alternative would be approximately one-third less than the proposed project. The estimated daily on-site population would be about 122 to 138 employees and between 2,300 to 2,600 shoppers per day, and would increase the concentration of people on the project site.

The reduced employee population and fewer shoppers would translate to fewer vehicle trips, both daily and PM peak-hour trips, reduced transit demand, and reduced parking demand. This alternative would generate approximately 7,266 weekday daily vehicle-trips and 595 peak-hour vehicle trips, and about 7,521 Saturday daily vehicle-trips and 890 peak-hour vehicle trips.³ This reduction in vehicle-trips could result in a reduction in vehicle delays at the local intersections as compared to the project. The operating conditions would be better than the proposed project and the levels of operation at the key intersections studied would be less than that of the proposed project. Neither the project nor this alternative would result in project-specific significant impacts on traffic flow, however, both would have an unmitigable significant contribution to the 2015 cumulative conditions (more than five percent increase) on the northbound U.S. 101 Freeway on-ramp at Alemany

³ Based on the weekday PM peak hour trip rate of 5.54 vehicle trips per 1,000 sq.ft., and Saturday midday peak hour trip rate of 8.28 vehicle-trips per 1,000 sq.ft. Trip rate data is from surveys conducted at four Home Depot stores in California.

Boulevard/Industrial Street; the southbound U.S. 101 Freeway on-ramp at Alemany Boulevard/Industrial Street; the northbound U.S. 101 Freeway on-ramp at Bayshore Boulevard/Cesar Chavez Street, the southbound U.S. 101 Freeway on-ramp at San Bruno Avenue, and the westbound I-280 Freeway on-ramp at Alemany Boulevard. Under this alternative, the Mission/Cortland intersection would operate at LOS F under the 2015 cumulative conditions.

Alternative D would not have a significant impact on air quality emissions of reactive organic gases (ROG), unlike the proposed project. The public service and utilities demand and energy/natural resources consumption under this alternative would be roughly thirty percent that of the proposed project. Operational noise would be about the same as the proposed project. The project effects related to geology, hydrology, hazardous materials, and potential subsurface cultural resources, however, would be comparable to those of the proposed project. The parking garage would be one-story shorter and the visual effects would be slightly less than the proposed project. Construction impacts of this alternative on traffic and air quality would be similar to those of the proposed project, though somewhat reduced in duration.

This alternative would meet the project sponsor's basic objectives of constructing a standard-sized Home Depot home improvement store within San Francisco, although the level of services and products would not be at the level the project sponsor would prefer.

Alternative E: A 140,000-Square-Foot Project

This alternative would also be a Home Depot store similar to the proposed project in terms of building exterior and parking garage. The total square footage would be approximately 140,000 sq.ft., about 13,000 sq.ft. less than the proposed project (a reduction of approximately eight and a half percent). The parking garage would have about 500 parking spaces on two levels plus rooftop (about 50 spaces fewer than the proposed project). The exterior building in Alternative E would be similar to the proposed project.

- Alternative E is the maximum size project that would avoid potentially significant air quality impacts of emissions of reactive organic gases (ROG). Most of the other potential impacts identified for the proposed project would occur with Alternative D, but at a slightly lower level. The change in land use would be the same, but the size and resultant population density of this alternative would be

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approximately eight and a half percent less than the proposed project. The estimated on-site population would be about 149 to 180 employees and between 2,400 to 2,700 shoppers per day, and would increase the concentration of people on the project site.

Alternative E would generate approximately 776 weekday peak-hour vehicle trips and about 1,159 Saturday peak-hour vehicle trips, compared to the proposed project's 848 weekday PM peak hour vehicle trips and 1,268 vehicle trips in the Saturday midday peak hour. This small reduction in vehicle-trips could result in a equivalent reduction in vehicle delays at the local intersections as compared to the project. The operating conditions would be about the same as the project, and the levels of congestion at the key intersections studied would be similar to the proposed project. The exception in LOS would be at the Bayshore/Jerrold/US 101 intersection, which would remain at LOS C (rather than LOS D with the proposed project) during the weekday PM peak hour. The intersection of Mission Street/Cortland Avenue would still require a signal upgrade to accommodate the growth in traffic volumes along Mission Street.

Neither the project nor this alternative would result in project-specific significant impacts on traffic flow, however, both would have a significant unmitigable contribution to the 2015 cumulative conditions (more than five percent increase) on the northbound U.S. 101 Freeway on-ramp at Alemany Boulevard/Industrial Street; the southbound U.S. 101 Freeway on-ramp at Alemany Boulevard/Industrial Street; the northbound U.S. 101 Freeway on-ramp at Bayshore Boulevard/Cesar Chavez Street, the southbound U.S. 101 Freeway on-ramp at San Bruno Avenue, and the westbound I-280 Freeway on-ramp at Alemany Boulevard.

It is assumed that the same traffic improvement measures as the proposed project would be included with this alternative: traffic signals and pedestrian crosswalks would be installed at Bayshore Boulevard and Cortland Avenue, a left-turn pocket would be created for southbound Bayshore Boulevard traffic to enter the project site, the northbound Bayshore left-turn pocket would be lengthened, and just north of the project site, the median on Bayshore Boulevard would be modified to allow northbound traffic to make U-turns.

Alternative E would cause increased emissions of nitrogen oxides, particulates and carbon monoxide in the region, though these increases would be approximately eight and a half percent less than that

generated by the proposed project. The increases would be less than significant relative to total regional emissions of these pollutants, and would be below the BAAQMD's thresholds of significance.

The public services demand and energy consumption under this alternative would be roughly 91.5 percent than that of the proposed project. Operational noise would be about the same as the proposed project. Alternative E's effects related to visual quality, geology, hydrology, hazardous materials, and potential subsurface cultural resources, however, would be comparable to those of the proposed project. Construction impacts of this alternative would also be similar to those of the proposed project.

This alternative would meet the project sponsor's basic objectives of constructing a standard-sized Home Depot home improvement store within San Francisco, although it would not be at the level the project sponsor would prefer to offer Home Depot's complete range of home improvement services and products, including a garden center of approximately 8,500 sq.ft., an enclosed greenhouse of approximately 10,000 sq.ft., and a full service lumber department.

G. AREAS OF CONTROVERSY AND ISSUES TO BE RESOLVED

This environmental impact report focuses on the issues of air quality, transportation, hazards, and archeological cultural resources. All other potential environmental effects were found to be at a less-than-significant level or to be mitigated to a level of less-than-significance with mitigation measures agreed to by the project sponsor. Please see the Initial Study, included in this document as Appendix A, for analysis of issues other than land use, air quality, transportation, hazards, archeological cultural resources and growth inducement.

Comments were received on the Initial Study relating to the size of the proposed project, possible alternatives, and the probable impacts on visual quality, land use, growth inducement, traffic and transportation, air quality, groundwater, toxic hazards and the economic effects on local businesses. These areas may be considered by some members of the public to be controversial and need to be resolved.

II. PROJECT DESCRIPTION

- The project sponsor, Home Depot, proposes to construct an approximately 153,089 sq.-ft. home improvement store and a separate 539-space parking garage on a 5.73-acre site at 491 Bayshore Boulevard and 196 Loomis Street.

A. PROJECT SPONSOR'S OBJECTIVES

The project sponsor has the following objectives for the proposed project:

- To construct a standard-sized Home Depot home improvement store within the City and County of San Francisco, offering Home Depot's complete range of home improvement services and products, including a garden center of approximately 8,500 sq.ft., an enclosed greenhouse of approximately 10,000 sq.ft., and a full service lumber department.
- To locate a Home Depot home improvement store with convenient freeway and roadway access, and on a parcel large enough to provide sufficient parking and loading spaces to meet projected customer demand and operational needs.
- To reuse an existing site with commercial uses similar to those previously operated on the site.
- To provide a wider range of home improvement goods and services and at competitive prices not otherwise available within the City and County of San Francisco.
- To satisfy a home improvement market need for both do-it-yourself customers and local contractors in San Francisco and the surrounding area.
- To site a new full-service Home Depot in a location that will relieve over-crowding at the Home Depot home improvement center located in Colma, California, and make it easier for existing Colma customers from San Francisco to shop closer to home.
- To comply with the objectives of the *General Plan*, the *City Planning Code* and all applicable codes and ordinances of the City and County of San Francisco, including the First Source Hiring Program.
- To develop a project consistent with the Industrial Protection Zone standards that apply to the site, and consistent with the Redevelopment Concept Plan (in process) for the Bayview Hunters Point Redevelopment Survey Area.

B. PROJECT LOCATION

The project site is located at 491 Bayshore Boulevard/196 Loomis Street, and is part of the major City block bounded by a one-story industrial building to the north, Waterloo Street to the south,

II. PROJECT DESCRIPTION

Loomis Street to the east, and Bayshore Boulevard to the west in an industrial area of San Francisco (Figure 1, Project Location, page 27). The 249,699 sq.-ft. site (approximately 5.73 acres) currently contains two buildings, both of which are vacant. The Goodman Lumber Company previously operated a 76,846 sq.-ft. home improvement and building supply store on a portion of the site. Whole Earth Access, a retail home furnishing and supply store, operated out of the second building, which is approximately 30,500 sq.ft. (for a total of 107,346 sq.ft.). Whole Earth occupied its portion of the property until June of 1999 and Goodman Lumber Company ceased its operation in August of 2000. The buildings have been vacant since those dates.

The project site is on Assessor's Block 5598, Lots 8, 9, 11, 13, 15, 16, 18, 21, and 28. The site is rectangular shaped with a slight curve, approximately 797 feet 7 inches along the Bayshore Boulevard frontage, approximately 770 feet 7 inches on the Loomis Street frontage, and about 317 feet 8 inches along the Waterloo Street and north property lines. The site is relatively flat with a slight elevation change of about six feet sloping down to the east.

The project site is located in an M-1 (Light Industrial) zoning district in the Bayview Hunters Point neighborhood, and within a 65-J height and bulk district. The M-1 district accommodates wholesaling and business services, and some light manufacturing and processing. In recognition of the potentially adverse effects of industrial uses and the proximity of industrial districts to residential and other commercial areas, standards are imposed as to enclosure within buildings and screening of outdoor uses.

C. PROJECT CHARACTERISTICS

- The proposed project is to demolish the two existing buildings and construct a two-story, approximately 153,089 sq.-ft. home improvement store, including an approximately 8,546 sq.-ft. outdoor garden center, and a 9,888 sq.-ft., enclosed greenhouse. The main store would be two stories, with approximately 96,250 sq.ft. on the main floor and 38,405 sq.ft. on the second floor (Figures 2, 3, 4, 5, and 6, pages 28 to 32). An approximately 235,597 sq.-ft. parking garage would be constructed as a separate structure that would contain the 38,405 sq.-ft. second floor sales area (which is included in the 153,089 sq.-ft. total for the home improvement center and is not included in

the parking square footage), accessible by elevator and escalator to the ground floor sales area. The total square footage of the project would be approximately 388,686 sq.ft., including all parking areas.

- The main store would be constructed of tilt-up concrete walls with a concrete slab floor. A separate 539-space, two-story parking garage plus rooftop parking would also be constructed with cast-in-place concrete. The buildings would be approximately 40 feet in height. There would be an

II. PROJECT DESCRIPTION

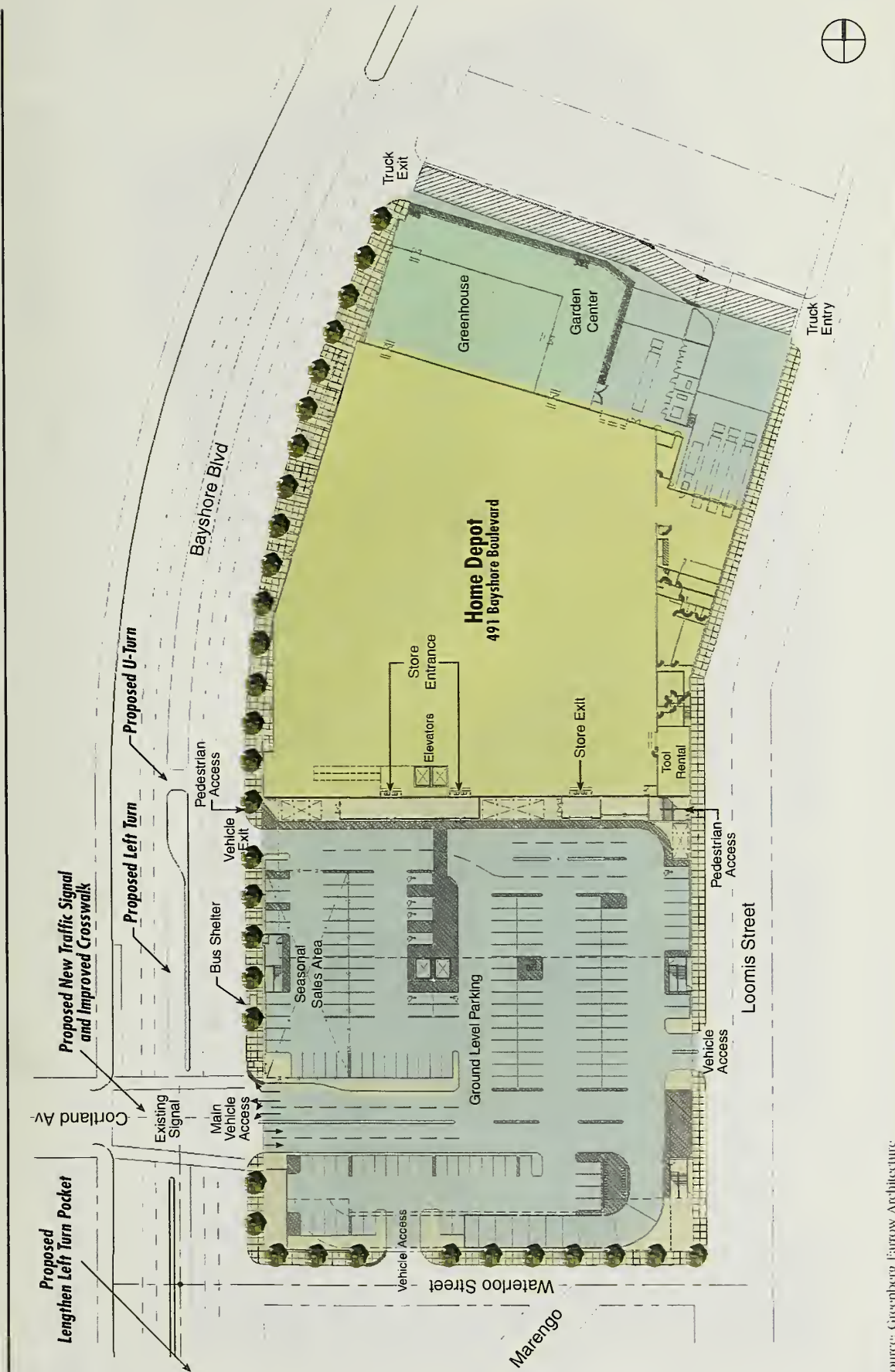


Source: During Associates

6 24 05

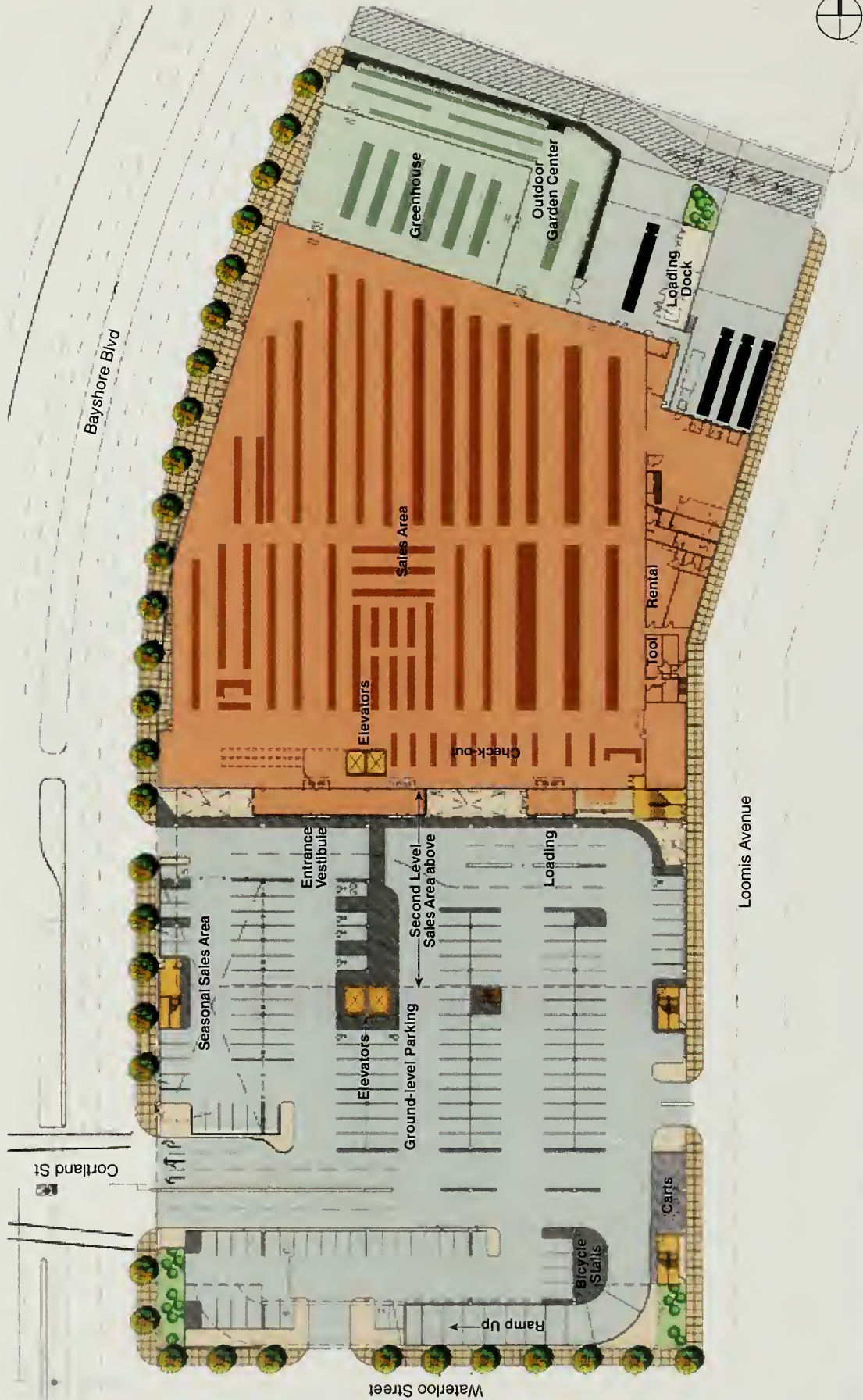
● PROJECT LOCATION FIGURE 1

● SITE PLAN **FIGURE 2**



Source: Greenberg Farrow Architecture

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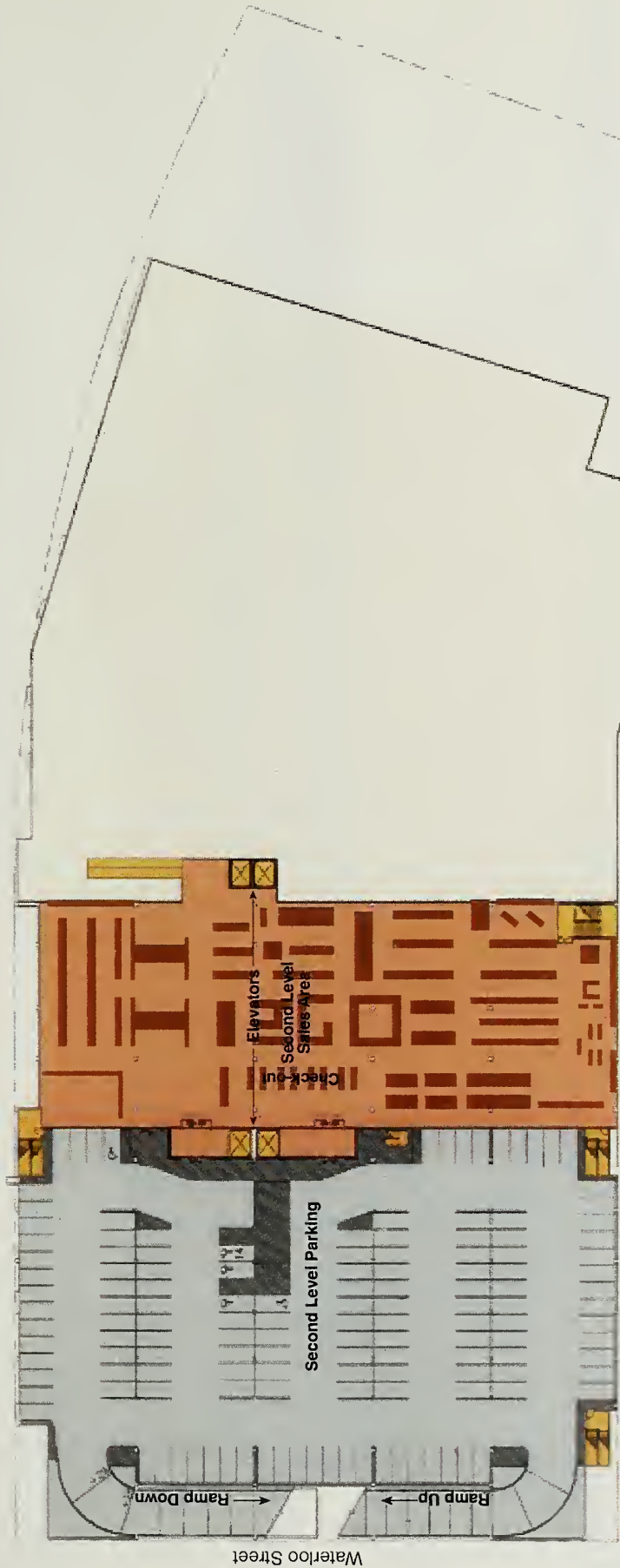
Source: Greenberg Farrow Architecture

GROUND LEVEL PLAN FIGURE 3



Bayshore Blvd

Cortland St



Loomis Avenue

Source: Greenberg Farrow Architecture

SECOND LEVEL PLAN FIGURE 4



ROOFTOP PARKING PLAN FIGURE 5

Source: Greenberg Farrow Architecture



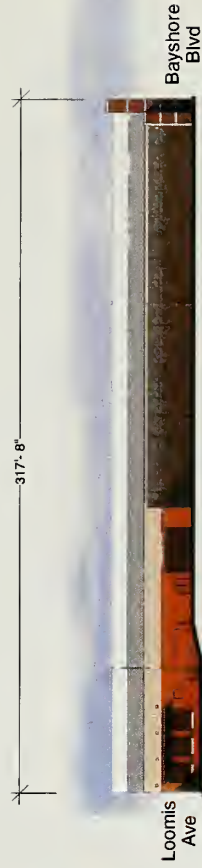
Bayshore Boulevard Elevation



Loomis Avenue Elevation



Waterloo Street Elevation



Gordon Center (North) Elevation

Source: Greenberg Farrow Architecture

ELEVATIONS **FIGURE 6**

approximately 4½-foot tall wall with a 6-foot trellis along the periphery of the roof to shield the views of parked cars. Four loading docks would be provided at the northeast corner of the site with access from Loomis Street.

Vehicular access to the parking facility would be from Bayshore Boulevard, where Cortland Avenue dead ends into Bayshore Boulevard, and from Loomis and Waterloo Streets. New traffic signals would be added, countdown pedestrian lights and pedestrian crosswalks would be installed at Bayshore Boulevard and Cortland Avenue, a left-turn pocket would be created for southbound Bayshore Boulevard traffic to enter the project site, the northbound Bayshore Boulevard left-turn lane would be extended, and just north of the project site, the median on Bayshore Boulevard would be changed to allow northbound traffic to make U-turns.

Because the site slopes down from Bayshore Boulevard, fill would be required along the southern portion of the site. Development of the site would require excavation of approximately 8,500 cubic yards of soil for footings and foundation. Construction of the foundation system would include pile driving.

- Project construction would take about 16 months. Construction is expected to begin in 2005, with the store opening in late 2006. The project sponsor is Home Depot, and the project architect is Greenberg Farrow Architecture.

D. PROJECT APPROVAL REQUIREMENTS

This EIR has undergone a public comment period as noted on the cover of this report, including a public hearing before the Planning Commission on the Draft EIR. Following the public comment period, responses to written and oral comments were prepared and published in a Draft Summary of Comments and Responses, presented to the Planning Commission for certification as to accuracy, objectivity, and completeness. No approvals or permits may be issued before the Final EIR is certified by the Planning Commission.

The *San Francisco Planning Code*, which incorporates by reference the City's Zoning Maps, governs permitted uses, densities, and the configuration of buildings within San Francisco. Permits to

construct new buildings (or to alter or demolish existing ones) may not be issued unless either the proposed project conforms to the *Code*, or an exception is granted pursuant to provisions of the *Code*. The proposed project would not require any exceptions to the *Planning Code*.

The proposed project would require approval from the Department of Public Works for curb cuts on Bayshore Boulevard and Loomis Street, and approval from the Department of Parking and Traffic and the Interdepartmental Staff Committee on Traffic and Transportation (ISCOTT) for the installation of new traffic signals and pedestrian crosswalks at Bayshore Boulevard and Cortland Avenue, the creation and extension of north and south bound left-turn pockets on Bayshore Boulevard, and the change to the median on Bayshore Boulevard. The southbound Bayshore left-turn pocket and changes to the median on Bayshore Boulevard would require approval by the Board of Supervisors.

Environmental plans and policies are those, like the *Bay Area Air Quality Plan*, which directly address physical environmental issues and/or contain targets or standards which must be met in order to preserve or improve characteristics of the City's physical environment. The proposed project would not obviously or substantially conflict with any such adopted environmental plan or policy.

In November 1986, the voters of San Francisco approved *Proposition M, the Accountable Planning Initiative*, which added Section 101.1 to the *San Francisco Planning Code* to establish eight Priority Policies. These policies are: preservation and enhancement of neighborhood-serving retail uses; protection of neighborhood character; preservation and enhancement of affordable housing; discouragement of commuter automobiles; protection of industrial and service land uses from commercial office development and enhancement of resident employment and business ownership; maximization of earthquake preparedness; landmark and historic building preservation; and protection of open space. Prior to issuing a permit for any project which requires an Initial Study under CEQA; prior to issuing a permit for any demolition, conversion, or change of use; and prior to taking any action which requires a finding of consistency with the *General Plan*, the City is required to find that the proposed project or legislation is consistent with the Priority Policies.

II. PROJECT DESCRIPTION

The proposed project would be a principally permitted use and would not require special authorization by the Planning Commission; however, the project sponsor and the Planning Department have agreed to submit the project to the Planning Commission for a public hearing under discretionary review. The case report and approval motions for the proposed project will contain the analysis determining whether the proposed project is consistent with the Priority Policies.

III. ENVIRONMENTAL SETTING AND IMPACTS

An application for environmental evaluation for the proposed project was filed January 23, 2001. A Preliminary Mitigated Negative Declaration was published on September 29, 2001, and appealed to the Planning Commission. Upon further analysis, the Planning Department determined that an Environmental Impact Report (EIR) was required. A revised Initial Study was published on March 9, 2002, and determined that the following effects of the proposed project would either be insignificant or would be reduced to a less-than-significant level by mitigation measures included in the proposed project and thus required no further analysis: land use; population; shadows; wind; noise; utilities/public services; biology; geology/topography; water; energy/natural resources; lead paint and asbestos hazards; and architecturally historic cultural resources (see Appendix A, page A-1, for the Initial Study). Therefore, the EIR does not discuss these issues. The proposed project's potentially significant impacts in the areas of transportation and air quality are assessed in this chapter. Land use, hazards, and prehistoric cultural resources are also discussed in the EIR for informational purposes.

A. LAND USE, ZONING, AND GENERAL PLAN CONSISTENCY

The Initial Study concluded that the proposed project would not have significant adverse land use impacts (for further information, see Appendix A, page A-11). Land use information is included in the EIR for informational purposes and to orient the reader.

Setting

LAND USE

The project site is within an M-1 (Light Industrial) District in the Bayview Hunters Point neighborhood (see Figure 7, page 36). Other zoning districts in the surrounding area include P (Public Use), RH-1 (One-Family Residential District), RH-1(D) (One-Family Residential District, Detached Dwellings), RH-2 (Two-Family Residential District), RH-3 (Three-Family Residential District),

III. ENVIRONMENTAL SETTING AND IMPACTS
LAND USE, ZONING, AND GENERAL PLAN CONSISTENCY

RM-1 (Residential Mixed, Low Density District), C-M (Heavy Commercial District), M-2 (Heavy Industrial District), NC-1 (Neighborhood Commercial Cluster District), NC-2 (Small-Scale, Neighborhood Commercial District), and NC-S (Neighborhood Commercial Shopping Center District). The proposed project is in a 65-J Height and Bulk District.

III. ENVIRONMENTAL SETTING AND IMPACTS
LAND USE, ZONING, AND GENERAL PLAN CONSISTENCY



- | | |
|---|--|
| RH-1, RH-2, RH-3 House Character districts | C-M Commercial district |
| RM-1 Mixed House and Apartment Character districts | M-1, M-2 Industrial district |
| P Public Use district | NCD, NC-S, NC-1, NC-2 Neighborhood Commercial districts |

Source: City and County of San Francisco Planning Department
6-24-05

● ZONING DISTRICTS FIGURE 7

Section 210.5 of the San Francisco *Planning Code* describes the M-1 District in the following manner: “This district provides land for industrial development. In general, the M-1 Districts are more suitable for smaller industries dependent upon truck transportation. In M-1 Districts, most industries are permitted, but some with particularly noxious characteristics are excluded. The permitted districts have certain requirements as to enclosure, screening and minimum distance from Residential Districts.”

The project site, consisting of nine lots, is shown in Figures 8 and 9 on pages 38 and 39. Adjacent to the project site at the north end of this block, there are three buildings (a masonry supply warehouse and storage lot, a commercial retail store and parking lot, and a fast food restaurant). The zoning north and south of the project on Bayshore Boulevard and to the east is M-1. The proposed project is in the San Francisco Redevelopment Agency’s South Bayshore Survey Area. A Concept Plan for the area is in process and the project site is in a sub-area proposed for continued retail commercial use.

- A child care center, the Big City Montessori School, is located about 300 feet from the proposed project at the northeast corner of Loomis Street and Industrial Street. The nearest residential development is west of Bayshore Avenue and west of U.S. 101 in the Bernal Heights neighborhood, less than 400 feet from the project site. The commercial buildings in the general area of the project site range from one to two stories, large in mass/bulk, with a mix of commercial activity, both industrial and retail in character. Some of the uses located immediately adjacent to the project site include fast food, auto body repair, and warehouse. A building supply warehouse is located to the south, across Waterloo Street. Several industrial-type businesses including a large equipment rental company are located east of the property across Loomis Street. A Jack in the Box and various one- and two-story industrial buildings, home supply stores, and retail warehouses are located to the west side, across Bayshore Boulevard. A garden center market is located south of Cortland and north of Industrial Avenue. A closed Office Max store is south of Industrial Avenue.

In the vicinity of the project site, U.S. 101 has north- and southbound off-ramps at Silver Avenue, and I-280 has on- and off-ramps west of Alemany Boulevard/Industrial Street. U.S. 101 and I-280 merge at Cesar Chavez Street (Army Street) just south of the project site at the Alemany interchange (refer to Figure 10, page 46). Silver Terrace residential area is approximately 1,800 feet to the south of the project site south of I-280. Cortland Avenue is the principal street through Bernal Heights and serves to connect Mission Street and Bayshore Boulevard. The subject site is near the eastern edge of the Bernal Heights neighborhood but is considered to be in the Bayview Hunters Point neighborhood of San Francisco.



Project Site Looking Southeast Across Bayshore Boulevard



Project Site Looking Northeast Across Bayshore Boulevard

Source: Square One Productions

PROJECT VIEWS FIGURE 8



Project Site Looking South on Loomis Street



Project Site Looking North on Loomis Street

Source: Square One Productions

PROJECT VIEWS FIGURE 9

The proposed use would be similar to some of the uses formerly existing at the site. Goodman Lumber Company was a retail home improvement and building supply store that included an outdoor garden center. Whole Earth Access was a retail store that sold home furnishings, appliances, books, computers, kitchen accessories and clothing. The proposed project would be a retail home improvement and supply store that includes an outdoor garden center. The existing buildings on the site total approximately 107,000 sq.ft. and the new Home Depot store (including the greenhouse and outdoor garden center) would be about 153,100 sq.ft.

While the proposed project would contain some of the previous uses on the site, it would be a larger development and would increase the density of use, number of customers and amount of vehicles to the site. However, the proposed project would not essentially change the existing retail/light industrial character or physical arrangement of the area. The use would be generally compatible with the mix of surrounding commercial and industrial uses in a dense urban area.

PLANS

The General Plan

The proposed project would intensify the use of the site in a manner generally consistent with the *General Plan*. Some key objectives and policies of the *General Plan* relevant to the proposed project are noted here; others may be addressed during consideration of project approval.

Commerce and Industry Element

- Objective 1, Policy 1, to “encourage development which provides substantial net benefits and minimizes undesirable consequences. Discourage development which has substantial undesirable consequences that cannot be mitigated.”
- Objective 3, to “provide expanded employment opportunities for City residents, particularly the unemployed and economically disadvantaged.”

Urban Design Element

- Objective 3, Policy 1, to “promote harmony in the visual relationships and transitions between new and older buildings.”
- Policy 2, to “avoid extreme contrasts in color, shape and other characteristics which will cause new buildings to stand out in excess of their public importance.”

III. ENVIRONMENTAL SETTING AND IMPACTS
LAND USE, ZONING, AND GENERAL PLAN CONSISTENCY

- Policy 5, to “relate the height of buildings to important attributes of the city pattern and to the height and character of existing development.”
- Policy 6, to “relate the bulk of buildings to the prevailing scale of development to avoid an overwhelming or dominating appearance in new construction.”

Environmental Protection Element

- Objective 1, Policy 4, to “assure that all new development meets strict environmental quality standards and recognizes human needs.”
- Objective 14, to “promote effective energy management practices to maintain the economic vitality of commerce and industry.”
- Objective 14, Policy 1, to “increase the energy efficiency of existing commercial and industrial buildings through cost-effective energy management measures.”

Transportation Element

- Policy 6.1, to “designate expeditious routes for freight trucks between industrial and commercial areas and the regional and state freeway system to minimize conflicts with automobile traffic and incompatibility with other land uses.”
- Policy 23.6, to “ensure convenient and safe pedestrian crossings by minimizing the distance pedestrians must walk to cross a street.”
- Policy 23.7, to “ensure safe pedestrian crossings at signaled intersections by providing sufficient time for pedestrians to cross streets at a moderate pace.”
- Policy 30.1, to “assure that new or enlarged parking facilities meet need, locational and design criteria.”
- Policy 40.1, to “provide off-street facilities for freight loading and service vehicles on the site of new buildings sufficient to meet the demands generated by the intended uses. Seek opportunities to create new off-street loading facilities for existing buildings.”

● **South Bayshore Area Plan Element**

- Policy 3.1, to 'improve and establish truck routes between industrial areas and freeway interchanges.'
- Policy 4.1, to 'develop a comprehensive network and schedule of roadway improvements to assure that South Bayshore maintains an adequate level of service at key intersections as the residential and work force population in the district increases.'
- Policy 7.3, to 'develop secondary nodes of commercial activity.'
- Objective 8, to 'strengthen the role of South Bayshore industrial areas in the overall economy of the district, the city, and the overall region.'

- Policy 8.1, to 'maintain industrial zones in Northern Industrial and India Basin subdistricts.'
- Objective 9, to 'improve linkage between growth in South Bayshore industrial areas and employment and business needs of the Bayview Hunters Point community.'

● Industrial Area Design Guidelines

New industrial buildings must:

- respect the prevailing industrial scale, pattern and architectural character of predominantly industrial blocks;
- utilize innovative materials and design that enrich the architectural character of predominantly industrial areas;
- provide loading and parking facilities in the rear which can be accessed through an alley or secondary street;
- provide mid-block alleys, courtyards and other design elements that help break down the scale of large industrial blocks; and
- be built to lot line at the street frontage, unless a pattern of a building set-back exists, in which case the prevailing set-back pattern should be reflected.

ZONING

The project site is located in an M-1 (Light Industrial) zoning district in the Bayview Hunters Point neighborhood. This site is also within a 65-J height and bulk district where heights up to 65 feet may be permitted. Bulk restrictions include a maximum building length of 250 feet and a maximum diagonal length of 300 feet. These restrictions would only apply if portions of the buildings exceeded 40 feet in height from the base of the buildings. The proposed new structures would be less than 40 feet in height, thus, the bulk restriction would not apply.

In January 2002, the Planning Commission established an Industrial Protection Zone Special Use District (IPZSUD) to protect and preserve production, distribution and repair land uses and activities from competing higher priced land uses and activities in some parts of the City. The proposed project site is within the IPZSUD, and the project would be a permitted use. Because the proposed development is not an office, housing and/or live/work project, the mandatory discretionary review that was required under the initial IPZ resolution would not have applied. The project sponsor and the Planning Department have agreed that the project should undergo discretionary review before the Planning Commission.

The proposed construction of more than 153,100 sq.ft. of retail space, if approved, would be subject to the application of the Jobs-Housing Linkage Program (*Planning Code* Sections 313.5 and 313.6), which would require the project sponsor to construct affordable housing or to pay an in-lieu fee to development of affordable housing by others.

B. TRANSPORTATION

A transportation study for the proposed project was conducted by Wilbur Smith Associates.¹ The results are summarized in this section.

Setting

ROADWAY NETWORK

Travel to and from the project site involves the use of regional and local transportation facilities, highways and transit services that link San Francisco with other parts of the Bay Area and northern California. The project site is accessible by local streets with connections to and from regional freeways and highways in the state system (Figure 1: Project Location, page 27).

United States Highway 101 (U.S. 101) is generally a north-south freeway, connecting San Francisco with the peninsula and beyond to the south, and Marin County and beyond to the north. Between I-80 and I-280, U.S. 101 is an eight- to ten-lane limited-access freeway. Between I-80 and

¹ Wilbur Smith Associates, *491 Bayshore Boulevard, Home Depot Transportation Study, Case No. 2001.0062E*, September 17, 2002. This report is available by appointment for review in file No. 2001.0062E at the Planning Department, 1660 Mission Street, fifth floor.

the Golden Gate Bridge, U.S. 101 is a six-lane surface street along Van Ness Avenue, Lombard Street and Doyle Drive. In the vicinity of the project site, U.S. 101 has northbound and southbound on- and off-ramps at Silver Avenue, Alemany Boulevard/Industrial Street and Cesar Chavez Street (Army Street).

Interstate 280 (I-280) is generally a north-south freeway connecting San Francisco with the Peninsula and South Bay. The freeway provides a direct connection to U.S. 101 and terminates at surface streets in the South of Market/Mission Bay area. At the interchange with U.S. 101, the I-280 is a six- to eight-lane freeway. In the vicinity of the project site, I-280 has eastbound and westbound on- and off-ramps at Alemany Boulevard.

Bayshore Boulevard is a north-south arterial that generally parallels U.S. 101, extending from Airport Boulevard in South San Francisco, through the City of Brisbane, to Cesar Chavez Street in San Francisco. Bayshore Boulevard merges into Third Street about 1¾ miles south of the project site. In the vicinity of the project site, Bayshore Boulevard has three travel lanes in each direction, with on-street parking on both sides of the street. In addition, Bayshore Boulevard has a center two-way turn lane, that allows for left-turns for both northbound and southbound traffic. The San Francisco *General Plan* designates Bayshore Boulevard as a Major Arterial in the Congestion Management Program (CMP) network, a Metropolitan Transportation System (MTS) Street, and a Transit Preferential (Transit Important) street to the south of U.S. 101. In addition, Bayshore Boulevard is part of bicycle route #25 (which operates on Paul Avenue and San Bruno Avenue south of the project site, and Potrero Avenue north of the project site).

Industrial Street is an east-west secondary arterial which links Bayshore Boulevard to Oakdale Avenue. Industrial Street is a four-lane roadway, with two lanes in each direction in the vicinity of the project site. Parking is prohibited on the south side of Industrial Street between Bayshore Boulevard and Loomis Street, but permitted on both sides of the street east of Loomis Street.

● **Alemany Boulevard** is an east-west major arterial that generally parallels I-280 throughout the southern portion of San Francisco. Alemany Boulevard operates between Bayshore Boulevard and Junipero Serra Boulevard, at which point it merges with Highway 1. In the vicinity of the project site, Alemany Boulevard has three lanes in each direction with no parking permitted on either side of the street. In the San Francisco *General Plan*, Alemany Boulevard is classified as a Major Arterial in the CMP Network and a MTS Street.

Oakdale Avenue is an east-west secondary arterial which links Bayshore Boulevard to Third Street. Oakdale Avenue is a four-lane roadway, with two lanes in each direction in the vicinity of the project site. Parking is permitted on both sides of the street. The north side between Bayshore Boulevard and Loomis Street is primarily commercial parking (yellow zone). In addition, Oakdale Avenue is part of bicycle routes #7, #25, and #70.

Loomis Street is a north-south local street connecting Industrial Street (across from Boutwell Street) to Oakdale Avenue. Loomis Street is a wide two-lane roadway, with one lane in each direction. Parking is permitted on both sides of Loomis Street.

Waterloo Street is an east-west local street connecting Loomis Street to Bayshore Boulevard. Waterloo Street is a narrow two-lane roadway, with one lane in each direction. Parking is permitted on the north side of the street.

Cortland Avenue is an east-west local street connecting Mission Street to Bayshore Boulevard through the Bernal Heights neighborhood. Cortland Avenue is a two-lane roadway, with one lane in each direction. Parking is generally permitted on both sides of the street.

Jerrold Avenue is a generally east-west local street connecting Third Street to Bayshore Boulevard. Jerrold Avenue is a two-lane roadway, with one lane in each direction. Parking is permitted on both sides of the street.

FREEWAY ON-RAMP OPERATING CONDITIONS

Existing freeway on-ramp level of service (LOS) operating conditions were determined for five key on-ramp locations in the vicinity of the proposed project that would serve traffic entering the regional freeway network. Operating conditions were based on freeway and ramp volumes obtained from Caltrans. The existing conditions were evaluated for the weekday PM peak hour (generally 5:00 to 6:00 p.m.) and the Saturday midday peak hour (generally 12:00 to 1:00 p.m.).

The operating conditions for the freeway on-ramps was evaluated using the *1994 Highway Capacity Manual (HCM)*² methodology. The Level of Service for the freeway-ramp junctions is based on the amount of vehicles (density) in the area of the freeway directly downstream of the analysis ramp. Density values of LOS A through E assume stable non-breakdown operations, while LOS F signifies that a breakdown condition exists or is expected to occur (i.e., the traffic flow on the freeway segment is not a steady, constant stream, but is instead characterized as start and stop conditions with extensive queuing). The location of the study freeway on-ramps is shown in Figure 10 on page 46.

As shown in Table 1 on page 47, during the weekday PM peak hour, four of the five study freeway on-ramps operate at LOS C. However, the westbound I-280 on-ramp from Alemany Boulevard currently operates at LOS F due to the high volume of commute traffic exiting San Francisco during this time period. During the Saturday midday peak hour, four of the five study freeway on-ramps operate at LOS B or C. However, the northbound U.S. 101 on-ramp from Bayshore/Cesar Chavez currently operates at LOS F due to high traffic volumes on the freeway and the general traffic congestion on U.S. 101/I-80 through downtown San Francisco.

In addition, a qualitative assessment was performed on the nearby freeway off-ramps. In general, the operations of freeway off-ramps are dictated by the operations of the adjacent and/or controlling intersections. For example, at the primary off-ramps that would be used to access the project site, the southbound U.S. 101 off-ramp to Alemany Boulevard is controlled by the intersection with Alemany/Putnam and the northbound U.S. 101 off-ramp to Alemany Boulevard is controlled by the intersection with Alemany/Cut-Thru Roadway. As such, the operation of these off-ramps is included in the analysis of the controlling intersection. For the off-ramps that are not located adjacent to study intersections, all were observed to be operating with acceptable conditions during the weekday PM peak hour and Saturday midday peak hour, with relatively short queues that did not spill to the freeway mainline.

² *1985 Highway Capacity Manual*, Special Report 209, Transportation Research Board (1994 Update).

III. ENVIRONMENTAL SETTING AND IMPACTS

TRANSPORTATION



Source: Wilbur Smith Associates

6-24-05

ROADWAY NETWORK AND INTERSECTION ANALYSIS LOCATIONS **FIGURE 10**

Table 1 Freeway On-Ramp Levels of Service Existing plus Project Conditions – Weekday PM and Saturday Midday Peak Hours									
On-Ramp Location	Weekday PM Peak Hour				Saturday Midday Peak Hour				
	Existing		Existing + Project		Existing		Existing + Project		
	LOS	Density	LOS	Density	LOS	Density	LOS	Density	
A. U.S. 101 NB @ Alemany/Industrial	C	25	C	25	C	22	C	22	
B. U.S. 101 NB @ Bayshore/Cesar Chavez	C	21	C	22	F	*	F	*	
C. U.S. 101 SB @ Alemany/Industrial	C	24	C	24	C	23	C	23	
D. U.S. 101 SB @ San Bruno	C	24	C	24	B	18	B	18	
E. I-280 WB @ Alemany	F	*	F	*	B	17	B	17	

Source: Wilbur Smith Associates – September 2001/March 2002

Notes:

Density presented in passenger cars per minute per lane (pcmppl).

* Unstable flow – density cannot be calculated.

INTERSECTION OPERATING CONDITIONS

Existing intersection LOS operating conditions were conducted for fourteen key intersection in the vicinity of the project site for weekday PM peak hour and Saturday midday peak hour conditions. Operating conditions were based on recent intersection and roadway traffic count data collected in the spring of 2001, fall of 2001 and the winter of 2002.³

Intersection LOS is a qualitative description of an intersection's performance based on the average delay per vehicle. Intersection LOS ranges from LOS A, which indicates free flow or excellent conditions with short delays, to LOS F, which indicates congested or overloaded conditions with extremely long delays. Typically, LOS E and F represent unacceptable levels of service.

Both signalized and unsignalized intersections were evaluated using the HCM methodology. For signalized intersections, this method determines the capacity for each lane group approaching the intersection. The LOS is then based on average delay (in seconds per vehicle) for the various movements within the intersection. A combined weighted average delay and LOS is presented for the intersection. For unsignalized intersections, average delay and LOS are calculated by approach (e.g., southbound) and movement (e.g., southbound left-turn), for those movements that are subject to delay. For the purpose of this report, the operating conditions (LOS and delay) for unsignalized intersections are presented for the worst approach, or the approach that would be most affected by the proposed project (e.g., the northbound approach at the intersection of Oakdale/Loomis and the southbound approach at the intersection of Industrial/Loomis).

Table 2 on the following page presents the existing intersection Level of Service for weekday PM peak hour and Saturday midday peak hour conditions. During the weekday PM peak hour, all signalized intersections operate with acceptable operating conditions (LOS D or better). In addition, at the four STOP-controlled intersections, the worst STOP-controlled approaches all operate with acceptable conditions. During the Saturday midday peak hour, all signalized intersections and all worst approaches at the STOP-controlled intersections operate at LOS D or better.

³ Intersection counts conducted after existing uses on the project site (Goodman and Whole Earth Access) were closed.

Intersection	Weekday PM Peak Hour				Saturday Midday Peak Hour			
	Existing		Existing + Project		Existing		Existing + Project	
	Delay ¹	LOS	Delay ¹	LOS	Delay ¹	LOS	Delay ¹	LOS
Signalized Intersections								
1. Bayshore/Jerold/US101 NB off	24.1	C	25.1	D	29.1	D	30.6	D
2. Bayshore/Oakdale	19.7	C	29.7	D	15.6	C	18.0	C
3. Bayshore/Cortland	17.2	C	27.4	D	9.8	B	34.6	D
4. Bayshore/Industrial	25.9	D	33.0	D	20.0	C	21.9	C
5. Bayshore/Silver	16.5	C	20.1	C	12.1	B	12.5	B
6. Alemany/Putnam/US101 SB off	15.2	C	15.5	C	24.1	C	33.2	D
7. Alemany/San Bruno/US101 SB on	14.7	C	17.9	C	13.0	B	16.1	C
8. Alemany/Cut-Thru/US101 NB off	4.7	A	4.9	A	3.4	A	4.1	A
9. Industrial/Cut-Thru	5.0	B	5.2	B	4.5	A	4.4	A
10. Mission/Cortland	14.5	B	22.4	C	16.5	C	32.4	D
STOP-Controlled Intersections								
11. Cortland/Andover ²	8.4	B	10.2	C	8.9	B	9.7	B
12. Cortland/Folsom ²	7.0	B	7.9	B	6.4	B	8.3	B
13. Oakdale/Loomis ³	16.1	C	16.6	C	8.6	B	8.7	C
14. Industrial/Loomis ⁴	6.7	B	8.6	B	7.8	B	5.6	B

Source: Wilbur Smith Associates – September 2001/March 2002

Notes:

¹ Delay presented in seconds per vehicle.

² Delay and LOS presented for worst STOP-controlled approach.

³ Delay and LOS presented for northbound approach.

⁴ Delay and LOS presented for southbound approach.

Since the time the traffic counts were conducted and the intersection operating conditions were developed for this report, the intersection of Oakdale/Loomis Streets was converted from two-way STOP-controlled (STOP signs at the northbound and southbound Loomis Street approaches) to all-way STOP-controlled. Due to the high volume of traffic on Oakdale Street, it was difficult for vehicles at the northbound and southbound approaches to travel through the intersection. However, with the installation of STOP-signs for Oakdale Avenue traffic, it has been observed that the average delay per vehicle at the northbound and southbound approaches has substantially decreased.

In 2000, the San Francisco Department of Parking and Traffic (DPT) instituted the Bernal Heights Traffic Calming Project Plan to address traffic problems in the Bernal Heights residential and commercial neighborhood.⁴ The goal of the project was to identify traffic issues in the neighborhood (such as speeding, congestion, cut-through traffic and collision hot-spots) and to address these issues through the placement of a series of traffic calming measures, including traffic circles, islands and bulb-outs. Along Cortland Avenue, the DPT Plan identified the following concerns: cut-through traffic along the entire street between Bayshore Boulevard and Mission Street; collision hot-spots at the intersections with Bayshore Boulevard, Nevada Street, Ellsworth Street, Andover Street and Mission Street; and congestion at the intersections of Cortland/Andover and Mission/Cortland. To address these issues, the study recommended the installation of center islands, new crosswalks, high-visibility crosswalks, curb bulb-outs and textured intersections along the street.

In addition, the study identified concerns at the intersection of Alemany/Putnam/U.S. 101 southbound off-ramp, including speeding, cut-through traffic, collisions and congestion. To address these issues, the study recommended the installation of a new traffic island and high-visibility crosswalks.

The proposed traffic calming measures, if implemented, would affect the configuration of the study intersections of Mission/Cortland, Cortland/Andover, Cortland/Folsom and Alemany/Putnam/U.S. 101 southbound off-ramp. However, these proposed changes would not substantially affect intersection operating conditions, since the changes would not reduce the number of traffic lanes, alter the traffic control devices, or substantially reduce the traffic volumes. As a result,

⁴ San Francisco Department of Parking and Traffic, *Draft South Bernal Heights Traffic Calming Plan*, 2002.

implementation of Bernal Heights Traffic Calming Project would not affect the intersection level of service analysis contained in this report.

TRANSIT NETWORK

Both local and regional transit service is provided near the proposed project, with local service provided by the San Francisco Municipal Railway (Muni) and regional service provided by SamTrans (Figure 11, page 52). In addition, regional service, such as BART, SamTrans, Golden Gate Transit and AC Transit is provided in downtown San Francisco and can be accessed by the adjacent transit lines.

Muni: The San Francisco Municipal Railway provides transit service within the City and County of San Francisco, operates several types of service, including bus (diesel and electric trolley), light rail (Muni Metro), cable car, and electric streetcar. The intersection of Bayshore/Cortland Avenues is a major transfer point for the Muni-9 San Bruno, 23-Monterey and the 24-Divisadero. Four Muni bus lines provide service in the vicinity of the project site, as discussed below:

- The **9-San Bruno** operates between Visitacion Valley and downtown San Francisco. The 9-San Bruno is a local route which operates seven days a week, with headways between 8 and 15 minutes. The closest inbound (toward downtown) stops are located near the intersection of Bayshore/Marengo Street and in front of the vacant Goodman Lumber building on Bayshore. Outbound, the closest stop is located directly across the street from the site on Bayshore Boulevard.
- The **23-Monterey** is a cross-town bus route in the south section of San Francisco. The 23-Monterey operates seven days a week, with headways between 15 and 20 minutes. The line links the San Francisco Zoo (west) at Sloat Boulevard to the Bayview Hunters Point area (east) along Palou Avenue. In the vicinity of the project site, the 23-Monterey operates on Industrial Avenue and Bayshore Boulevard, with the closest inbound stop located on Bayshore Boulevard in front of the project site and the closest outbound stop directly across the street from the site on Bayshore Boulevard.
- The **24-Divisadero** is a cross-town route which provides travel between the Pacific Heights, Haight, Castro, Noe Valley, Glen Park, Bernal Heights and Bayview Hunters Point neighborhoods. The 24-Divisadero operates seven days a week, at 15- to 20-minute headways throughout the day. In the vicinity of the project site, the 24-Divisadero operates on Cortland and Industrial Avenues, with the closest inbound and outbound stops located near the intersection of Bayshore Boulevard and Cortland Avenue.



Source: Wilbur Smith Associates

6/24/05

EXISTING TRANSIT NETWORK FIGURE 11

- The **44-O'Shaughnessy** is a cross-town route which provides travel between the Inner Richmond, Golden Gate Park, Twin Peaks, Glen Park, Portola, Silver Terrace and Bayview Hunters Point neighborhoods. The 44-O'Shaughnessy operates at 10- to 20-minute headways throughout the day. In the vicinity of the project site, the 44-O'Shaughnessy operates on Silver Avenue, with the closest stop located near the intersection of Bayshore/Silver.

SamTrans: The San Mateo County Transit District (SamTrans) provides bus service between San Mateo County and San Francisco. SamTrans operates 14 bus lines which serve San Francisco, including 12 routes into the downtown area. Two SamTrans bus routes (#292 and #397) run on Bayshore Boulevard and provide service in the vicinity of the project site. The #292 operates between San Mateo (at the Hillsdale Caltrain station), the San Francisco airport and downtown San Francisco, with 15- to 40-minute headways on weekdays and 30- to 60-minute headways on weekends. The #397 provides late-night service with one-hour headways between Palo Alto (at the Palo Alto Caltrain station) and downtown San Francisco on weekdays and weekends. The nearest inbound (towards downtown San Francisco) SamTrans stop is located on Bayshore Boulevard to the south of Waterloo Street, and the nearest outbound (away from downtown San Francisco) stop is located on Bayshore Boulevard north of Cortland Avenue.

PARKING CONDITIONS

The existing on-street parking supply and occupancy were qualitatively assessed for the east side of Bayshore Boulevard and both sides of Loomis Street between Industrial Street and Oakdale Avenue. The parking supply and occupancy were estimated based on field observations conducted in April 2001, from 1:00 to 3:00 p.m. for weekday and Saturday conditions, which represent the peak parking periods of the surrounding neighborhood. In general, the on-street parking throughout the study area is unmetered and unrestricted with the exception of street cleaning restrictions. Approximately 125 on-street parking spaces were identified on Bayshore Boulevard and Loomis Street, of which about 50 percent were estimated to be occupied on the weekday and weekend afternoon periods.

PEDESTRIAN CONDITIONS

The sidewalks along the east side of Bayshore Boulevard are 12- to 15-feet wide and crosswalks across Bayshore Boulevard are also 12- to 15-feet wide. On typical weekdays and weekends, pedestrian activity in the immediate vicinity of the project site is relatively light throughout the day.

Pedestrians are able to easily walk along the adjacent sidewalks and crosswalks without interference from vehicles and buses.

The distance across Bayshore Boulevard at Cortland Avenue is about 100 feet curb-to-curb (six travel lanes, two parking lanes and one center turn lane). Currently, about 20 to 25 seconds is provided at the traffic signals for pedestrians to cross Bayshore Boulevard. At the north side crosswalk at this location, a small mid-street island is available for persons unable to cross within the allotted time. Based on field observations, the primary reason for not crossing completely is due to pedestrians leaving late into the cycle, jaywalking, or experiencing delays due to traffic turning off of Cortland Avenue.

BICYCLE CONDITIONS

There are a number of bicycle routes in the vicinity of the project site. Route #25 runs along Bayshore Boulevard and serves as a primary north-south route linking the southeastern part of San Francisco to the Marina District. To the south of the project site, the #25 route runs on Paul Avenue and San Bruno Avenue; north of the project site the #25 route runs on Oakdale Avenue and Potrero Avenue. In addition, bicycle routes are also located on Oakdale Avenue (#7 and #70) and Silver Avenue (#70). These bicycle routes are classified as Class III, which means they contain route signs only, with no separate bicycle paths or lanes. On typical weekdays and weekends, bicycle activity in the immediate vicinity of the proposed project is light throughout the day.

Impacts

SIGNIFICANCE CRITERIA

The following are the significance criteria used by the Planning Department for the determination of impacts associated with the proposed project:

Freeway on-ramps: The operational impact on freeway on-ramps is considered significant when project-related traffic causes the on-ramp/freeway junction level of service to deteriorate from LOS D or better to LOS E or F, or from LOS E to LOS F. In addition, the project would have a significant effect on the environment if it would contribute substantially (over five percent contribution to the ramp volumes) to on-ramp congestion already at unacceptable levels, such that the period of peak congestion would be substantially lengthened.

Intersections: The operational impact on signalized intersections is considered significant when project-related traffic causes the intersection level of service to deteriorate from LOS D or better to LOS E or F, or from LOS E to LOS F. The project may result in significant adverse impacts at intersections that operate at LOS E or F under existing conditions depending upon the magnitude of the project's contribution to the worsening of the average delay per vehicle. In addition, the project would have a significant adverse effect if it would cause major traffic hazards or contribute considerably to cumulative traffic increases that would cause deterioration in levels of service to unacceptable levels.

Transit: The project would have a significant effect on the environment if it would cause a substantial increase in transit demand that could not be accommodated by existing or proposed transit capacity, resulting in unacceptable levels of transit service; or cause a substantial increase in operating costs such that significant adverse impacts in transit service levels could result.

Parking: Parking supply is not considered to be a part of the permanent physical environment in San Francisco.⁵ Parking conditions are not static, as parking supply and demand vary from day to night, day to day, month to month, etc. Hence, the availability of parking spaces (or lack thereof) is not a permanent physical condition, but changes over time as people change their modes and patterns of travel. Therefore, parking deficits are considered to be social effects, rather than impacts on the physical environment as defined by CEQA.

Thus, a parking shortage is not considered to be a permanent condition and is also not considered to be a physical environmental impact even though it is understood to be an inconvenience to drivers. Therefore, the creation of or an increase in parking demand resulting from a proposed project that cannot be met by existing or proposed parking facilities would not in and of itself be considered a significant environmental effect under CEQA. In the absence of such physical environmental impacts, CEQA does not require environmental documents to propose mitigation measures solely because a project is expected to generate parking shortfalls.

⁵ Under California Public Resources Code Section 21060.5, "environment" means "the physical conditions which exist within the area which will be affected by a proposed project, including land, air, water, minerals, flora, fauna, noise, and objects of historic or aesthetic significance."

Parking deficits may be associated with secondary physical environmental impacts, such as increased traffic congestion at intersections, air quality, or noise effects caused by congestion. However, as noted above, in the experience of San Francisco transportation planners, the absence of a ready supply of parking spaces, combined with available alternatives to auto travel (e.g., transit, taxis, bicycles or travel by foot) and the relatively dense patterns of urban development, may induce drivers to seek and find alternative parking facilities, shift to other modes of travel, or change their overall travel habits. Any such resulting shifts to transit service, in particular, would be in keeping with the City's "Transit First" policy.

Additionally, regarding potential secondary effects, cars circling and looking for a parking space in areas of limited parking supply is typically a temporary condition, often offset by a reduction in vehicle trips due to others who are aware of constrained parking conditions in a given area. Hence, any secondary environmental impacts that may result from a shortfall in parking in the vicinity of the proposed project would likely be minor and difficult to predict.

Pedestrians: The project would have a significant effect on the environment if it were to result in substantial overcrowding on public sidewalks, create potentially hazardous conditions for pedestrians, or otherwise interfere with pedestrian accessibility to the site and adjoining areas.

Bicycles: The project would have a significant effect on the environment if it would create potentially hazardous conditions for bicyclists or otherwise substantially interfere with bicycle accessibility to the site and adjoining areas.

Loading: Loading impacts were assessed by comparing the proposed loading space supply to the *Planning Code* requirements and the estimated loading demand during the peak hour of loading activities. The project would have a significant effect if the demand for loading space would be substantially greater than the loading dock supply.

Construction: Construction-related impacts generally would not be considered significant due to their temporary and limited duration.

PROJECT TRAVEL DEMAND

For the purpose of the analysis contained in this report, both the weekday PM peak hour (generally 5:00 to 6:00 p.m.) and the Saturday midday peak hour (generally 12:00 to 1:00 p.m.) conditions were assessed, since they represent the worst weekday and weekend conditions of the local transportation network. Due to the unique nature of the proposed land use, standard trip generation and mode splits from the San Francisco Planning Department's *Interim Transportation Impact Analysis Guidelines*⁶ (*SF Guidelines*) were not used. To determine weekday PM peak hour trip generation, driveway counts were performed at four similar Home Depot stores in California (see Appendix B), so that the trip generation of the proposed project could be based on actual activity levels. These four comparable stores were selected based on their access (either free-standing or with separate entrances/exits for their parking facilities) and location (within urbanized areas). From the driveway counts, weekday PM peak hour vehicle-trip generation rates (on a per square foot basis) were developed. The Saturday midday peak hour trip generation was based on a comparison between weekday PM peak hour and Saturday midday peak hour driveway counts from the Colma store. To determine the Saturday midday peak hour trip generation, the ratio between the weekday PM peak hour and Saturday midday peak hour driveway counts from the Colma store was ascertained. This ratio was applied to the weekday PM peak hour trip generation rate for the proposed project to estimate the project's Saturday midday peak hour trip generation rate.

Weekday PM Peak Hour and Saturday Midday Peak Hour Trip Generation: During the weekday PM peak hour, the average trip generation rate for the four surveyed locations was 5.54 vehicle-trips per 1,000 sq.ft., with approximately 48 percent of the vehicle-trips inbound to the site and 52 percent outbound from the site. During the Saturday midday peak hour, the trip generation rate was estimated to be 8.88 vehicle-trips per 1,000 sq.ft., with approximately 52 percent inbound to the site and 48 percent outbound from the site.

Weekday Peak Hour of Activity Trip Generation: It should be noted that the peak hour of weekday activity for the proposed land use typically occurs during the middle of the day. During this period, the maximum number of vehicles entering and exiting at the project driveways on

⁶ San Francisco Planning Department, *Interim Transportation Impact Analysis Guidelines for Environmental Review*, January 2000.

weekdays would occur. Although the proposed project would generate more vehicle-trips during this peak hour of activity than during the PM peak hour, the total intersection volumes would be lower, resulting in equal to or better intersection operating conditions; as such, only the queuing analysis was conducted for this time period. It was estimated that the trip generation during the peak hour of activity would be approximately 25 percent greater than during the weekday PM peak hour,⁷ which would result in a trip generation rate of about 6.93 vehicle-trips per 1,000 sq.ft. In addition, it was estimated that 52 percent of the vehicle-trips would be inbound to the site and 48 percent would be outbound from the site during this period.

Mode Split Assumptions: Due to the nature and typical location of Home Depot stores, very few customers and employees take transit, walk, or bicycle to and from the store. Since the proposed project would be located in a more urban and transit/walk/bicycle-accessible area than most other Home Depot locations, it is likely that more employees and customers may travel to and from the proposed project via these non-vehicular modes. However, for the purpose of the analysis contained in this report, it was assumed that all customer and employee trips generated by the proposed project would be via private vehicles. This assumption would result in a conservative estimate in the number of vehicle-trips generated by the proposed project, and would therefore result in a conservative analysis of the traffic impacts associated with the proposed project. The same mode split assumptions were used for the analysis of the three study time periods.

Overall, the proposed project would generate 848 vehicle-trips during the weekday PM peak hour, of which 409 vehicle-trips would be inbound to the site and 439 vehicle-trips would be outbound from the site. During the Saturday midday peak hour, the proposed project would generate about 1,268 vehicle-trips, of which 657 vehicle-trips would be inbound and 611 vehicle-trips would be outbound. During the weekday peak period of activity, the proposed project would generate about 1,060 vehicle-trips, of which 551 vehicle-trips would be inbound and 509 vehicle-trips would be outbound.

It should be noted that the Home Depot driveway counts used to develop the trip generation rates were conducted during the month of July. According to information provided by the project sponsor, the monthly sales at Home Depot stores vary throughout the calendar year. However, the highest

⁷ Institute of Transportation Engineers (ITE) *Trip Generation*, 6th Edition. Land Use #862.

monthly sales activity typically occurs in July, with sales over 20 percent greater than average. Monthly sales activity during the holidays (November and December) is substantially lower. As such, the trip generation rates used in this analysis represent the peak month of activity and would therefore represent the highest traffic volumes expected to be generated by the proposed project.

In addition, it should be noted that the weekday PM peak hour, weekday peak hour and Saturday midday peak hour trip generation rates used in this analysis are substantially higher than those presented in the Institute of Transportation Engineers (ITE) *Trip Generation* manual for a similar land use. As a result, the trip generation rates in this analysis would also result in a more conservative analysis of the traffic impacts associated with the proposed project.

Trip Distribution/Traffic Assignment: As a means to determine the distribution of the vehicle-trips generated by the proposed project, demographic forecasts for the proposed Bayshore Boulevard location were provided by the project sponsor. The project sponsor hired a market research firm to estimate the geographic location of its potential customers. This distribution was determined at a zip code level and accounted for the characteristics of the proposed store and its surrounding population. The characteristics of the store included the location of sister stores and the location of nearby competitors. The characteristics of the potential users were based on various factors of each nearby zip code, including the average distance to the store, number of dwelling units, percent of units that are owner occupied, and the median income of residents. Based on the demographic forecasts, it was estimated that 76 percent of the customers of the proposed project would come from San Francisco, with the remainder from cities to the south (including Brisbane, Daly City, South San Francisco, San Mateo, Millbrae, San Bruno and Colma).

This distribution was used as the basis for assigning the project-generated trips to the local streets and regional freeways in the study area. For each zip code, potential vehicular routes to and from the project site were identified (with consultation of Planning Department staff), and traffic was assigned based on the most convenient routes. Based on the location of the major roadways, freeways and their on- and off-ramps, it was estimated that approximately 24 percent of the vehicles would approach the proposed project from southbound Bayshore Boulevard, 48 percent from northbound Bayshore Boulevard, 13 percent from Cortland Avenue and 15 percent from Loomis Street. These assignments were used for all analysis time periods.

Parking Demand: Parking demand for the proposed project was estimated from a parking demand study conducted at other Home Depot stores nationwide.⁸ For the study, the hourly parking demand (both customer and employee) for 26 stores was counted on weekdays and weekends. The annual sales information for each store was obtained, and the sales information for the parking survey day was compared to the annual total. Based on this ratio, the parking demand was adjusted to account for the fifth busiest day at each store (parking facilities are typically sized to accommodate the fifth busiest day of activity, also referred to as the “design day”). Parking demand equations were then developed for both weekdays and weekends based on the size of the facility, in terms of square footage of the store and garden center. Overall, the proposed project is anticipated to have a peak demand for 502 spaces on a weekday and 539 spaces on a weekend. The peak parking demand for Home Depot stores typically occurs between 12:00 and 2:00 p.m. on weekdays and between 12:00 and 3:00 p.m. on weekends.

To ensure that the study parking demand rates would be consistent for local parking characteristics, the parking demand at the Home Depot store in Colma was determined for an average Saturday in June. During the Saturday midday peak hour, the parking demand at the Colma store was counted to be 367 spaces, which would be about 82 spaces fewer than calculated using the study parking demand rates (449 spaces). As a result, it is anticipated that the parking demand for the proposed project would be equal to, or less than, that presented above.

Loading Demand: Freight delivery demand generated by the proposed project was developed from information provided by the project sponsor based on the loading activity at a similar Home Depot location (Colma). It was estimated that the proposed project would generate 30 trucks per day – 15 semi tractor-trailers and 15 small trucks/vans. In general, deliveries would be made between 7:00 a.m. and 5:00 p.m., with occasional deliveries scheduled between 6:00 and 7:00 a.m., or between 5:00 and 6:00 p.m. The peak of the loading activities is anticipated to occur between 10:00 a.m. and 1:00 p.m., with approximately 50 percent of the activities scheduled for this period. The project sponsor estimated that there would be an average demand for two loading docks and a peak demand for four loading docks (two long-term and two short-term) at the proposed project. In addition, several of the small deliveries would likely take place next to the garden center, in the rear lumber off-loading area, or near the front of the store.

⁸ “Parking Demand Study – The Home Depot” by Barton-Aschman Associates, Inc. January 1992.

FREEWAY ON-RAMP IMPACTS

As Table 1 (page 47) indicates, the addition of the vehicle-trips generated by the proposed project would not change the operating conditions at the study locations for either the weekday PM peak hour or the Saturday midday peak hour analyses. All study freeway on-ramps would continue to operate at the same levels of service as under existing conditions.

It should be noted that with the *HCM* methodology for determining the operating conditions of freeway on-ramps, the density of the on-ramp/freeway junction is based upon the combined on-ramp volume and freeway mainline volume. As a result, minor changes to the on-ramp volumes (e.g., with the addition of the new vehicle-trips generated by the proposed project) would not result in substantial changes to the density, and correspondingly, the operating conditions of the study on-ramps.

The two study freeway on-ramps that operate at LOS F under Existing conditions would continue to operate at LOS F under Existing plus Project conditions. Overall, the proposed project would contribute about 3.5 percent to the total traffic volumes at the westbound I-280 on-ramp from Alemany Boulevard during the weekday PM peak hour, and about 2.2 percent to the total traffic volumes at the northbound U.S. 101 on-ramp from Bayshore/Cesar Chavez during the Saturday midday peak hour. Since the proposed project's contribution is less than five percent and would be imperceptible to drivers, it would not have a significant contribution to poor operating conditions at both freeway on-ramp analysis locations that would operate at LOS F under Existing and Existing plus Project conditions.

INTERSECTION IMPACTS

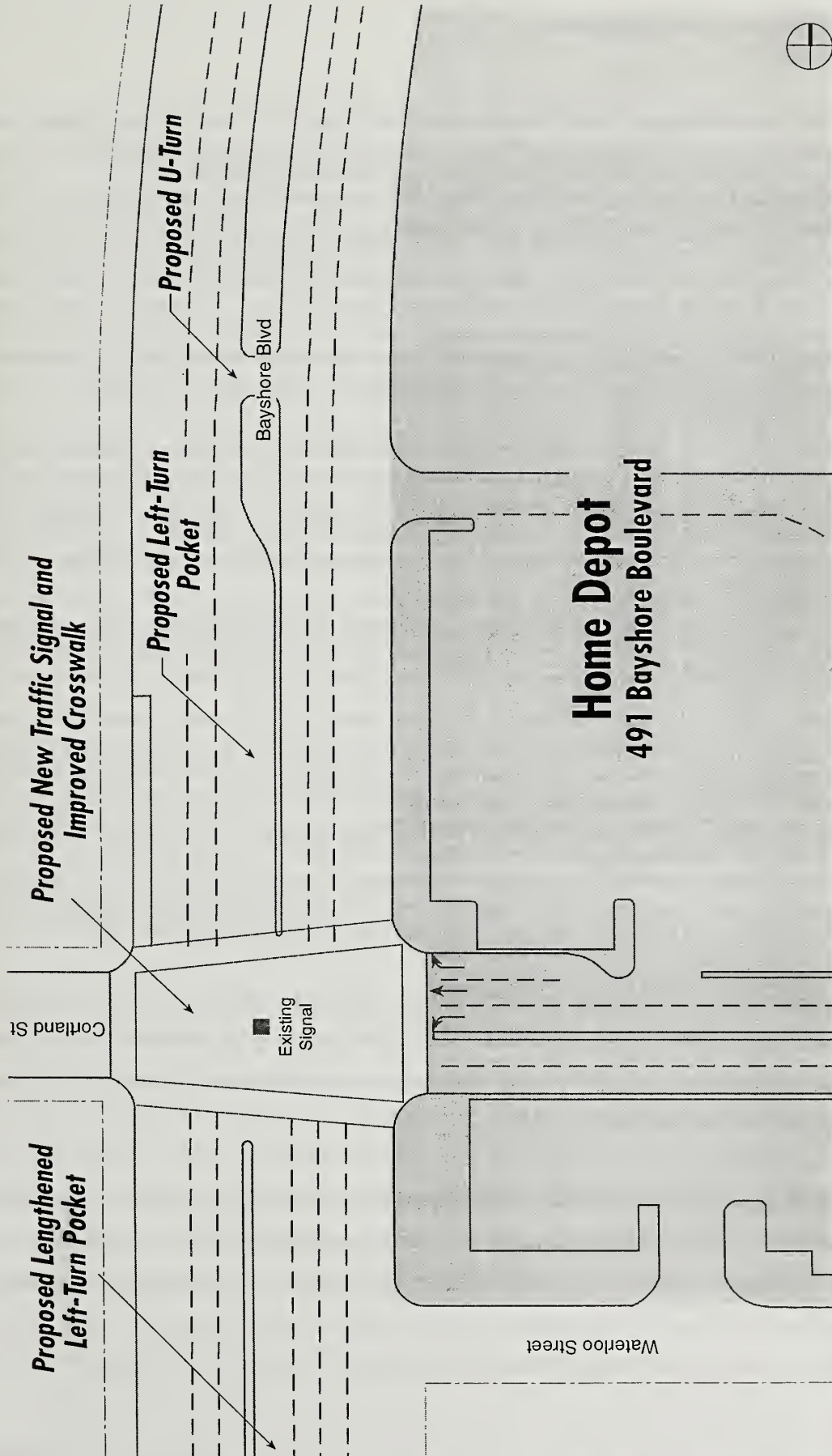
Table 2 (page 49) indicates that the addition of project-generated traffic would result in minimal changes in average vehicle delay at most of the study intersections, and all study intersections would continue to operate at similar service levels as under existing conditions. During both the weekday PM peak hour and the Saturday midday peak hour, all study intersections would continue to operate with acceptable (LOS D or better) conditions, and the proposed project would not result in any significant impacts.

Although the overall levels of service would remain similar, vehicles destined to and from the proposed project would result in a moderate increase in delay at individual movements at several study intersections. As such, vehicles making these movements may experience somewhat higher delays than vehicles at the intersection as a whole. However, the increase in delay at these individual movements would not result in the intersection operating at unacceptable service levels. In addition, the proposed project would also result in increases in traffic volumes at several movements at the study intersections. These volume increases would not increase the average delay per vehicle at the individual movements or the intersections as a whole.

On Cortland Avenue, the proposed project would add about 106 vehicles during the weekday PM peak hour and 159 vehicles during the Saturday midday peak hour. Currently, traffic volumes on Cortland Avenue are relatively light (about 750 vehicles per hour during the weekday PM peak hour and 700 vehicles per hour during the Saturday midday peak hour). As a result, the new vehicle-trips generated by the proposed project would increase the hourly traffic volumes on the roadway. Since the existing volumes are low, however, this increase would not substantially worsen operating conditions of intersections along Cortland Avenue.

Changes to Bayshore Boulevard and Bayshore/Cortland Intersection: As part of the proposed project, the configuration of the intersection of Bayshore/Cortland would be modified to account for vehicles destined to and from the proposed parking garage (see Figure 12, page 63). To accommodate vehicles destined to the project site from southbound Bayshore Boulevard, a southbound left-turn pocket would be created and a protected left-turn phase would be established within the Bayshore/Cortland signal timing plan. In addition, to account for the changes in signal timing, the northbound left-turn pocket would need to be extended. Further information about these changes include the following:

- Currently, there is a center two-way turn lane on Bayshore Boulevard between Cortland and Oakdale Avenues (i.e., both northbound and southbound left-turning traffic can use the lane). To provide access into the project site from southbound Bayshore Boulevard and to provide sufficient storage space for vehicles waiting in queue, a portion of the center-turn lane would need to be converted into an exclusive southbound left-turn pocket. Based on the results of the queuing analysis (see following discussion), a distance of 180 feet would be sufficient for the left-turn pocket.



Source: Greenberg Farrow Architecture

PROPOSED TRAFFIC IMPROVEMENTS **FIGURE 12**

- The conversion of the center-turn lane to an exclusive southbound left-turn pocket would affect vehicular access from northbound Bayshore Boulevard to approximately 12 parking spaces located at 470 Bayshore Boulevard (Kitchen Appliance Center). Currently, northbound traffic can enter the two-way left turn lane immediately north of Cortland Avenue and access the 90-degree parking spaces located in front of the store (note that direct vehicular access would continue to be maintained to the northern parking spaces on Bayshore Boulevard and to the separate parking lot off Cortland Avenue). Access to these parking spaces would be blocked by the southbound left-turn pocket. To provide access to these spaces, a northbound U-turn pocket would be created. This pocket would be located directly north of the southbound left-turn pocket, and would allow U-turns to occur mid-block. Examples of these facilities can be found further north on Bayshore Boulevard and on South Van Ness Avenue.
- Traffic signals at the intersection of Bayshore/Cortland would be changed with the proposed project. Since a new southbound left-turn phase would be needed, the signals on both northbound and southbound Bayshore Boulevard would be adjusted or upgraded. In addition, to accommodate vehicles exiting the proposed parking garage, a new traffic signal would be installed at this location and a new westbound phase to the signal timing would be established.
- As part of the new signalization, pedestrian signals with countdown indicators (WALK/DON'T WALK indicators which present the time remaining to cross the street) would be installed at all four crosswalks.
- The northbound left-turn pocket at Bayshore Boulevard to Cortland Avenue is currently about 140 feet long, which provides storage space for about seven vehicles. Due to the changes in the intersection signal timing and phasing, however, the amount of green time provided to the northbound left-turn movement would decrease. As a result, the length of the queue would increase (as discussed in the following section). To accommodate this longer queue, the northbound left-turn pocket would be extended by approximately 70 feet (to a total distance of 210 feet) by carving out a portion of the center concrete island. The left-turn pocket could be extended up to 280 feet long. This change would not affect the current configuration of the northbound and southbound Bayshore Boulevard travel lanes.

To potentially improve operations and safety of the eastbound approach of Cortland Avenue to Bayshore Boulevard, the current configuration of the street could be modified to provide two lanes in the eastbound approach to the intersection. This would be an improvement measure in addition to those measures proposed as part of the project.

At the eastbound approach of Cortland Avenue to Bayshore Boulevard, Cortland Avenue is 40 feet wide, with one travel lane in each direction and on-street parking and bus stops on both sides of the street. At the approach, the bus stop for the Muni 24-Divisadero is 120 feet long (the entire length of the block between Bayshore Boulevard and Hilton Street) and the travel lane is 17 feet wide (the travel lane for westbound Cortland Avenue is 23 feet wide). When buses are not stopped at the bus

stop, the eastbound approach usually operates as two lanes – vehicles turning left travel in the regular traffic lane and vehicles turning right travel in the bus stop. When buses are stopped, however, they limit the potential for right-turning vehicles to use the bus stop as a right-turn lane and can block the regular travel lane. When this occurs, lengthy queues can develop and vehicles encroach into the westbound lane to maneuver around the stopped bus.

As an improvement measure to improve operations and safety at the eastbound approach of Cortland Avenue to Bayshore Boulevard, the centerline between the eastbound and westbound directions could be restriped to provide 24 feet in the eastbound direction and 16 feet in the westbound direction. In addition, the bus stop could be shortened to 60 feet long (starting at Hilton Street) and two lanes could be striped at the approach (providing about 60 feet at the second lane). As a result of these changes, vehicular circulation would improve and the operating conditions of the approach and the entire Bayshore/Cortland intersection with the project would be helped (to an average delay of 26.9 seconds per vehicle during the weekday PM peak hour and to an average delay of 33.8 seconds per vehicle during the Saturday midday peak hour).

It should be noted that, with the narrowed westbound lane, long trucks, buses and other similar vehicles may cross the center line when turning right from southbound Bayshore Boulevard. In addition, with a 16-foot-wide westbound lane, the two on-street parking spaces along the north curb of Cortland Avenue would be eliminated. As a result, additional engineering study and coordination with the appropriate City agencies would be required before these changes could be implemented.

Queuing Analysis: To supplement the analysis of the intersection operating conditions, a queuing analysis was performed at the intersection of Bayshore/Cortland, where the main project driveway would be located. For the analysis, the queues at the southbound left-turn from Bayshore Boulevard to the garage driveway at Cortland Avenue, the northbound left-turn from Bayshore Boulevard to Cortland Avenue and along eastbound Cortland Avenue approach to Bayshore Boulevard were assessed for the weekday PM peak hour, Saturday midday peak hour and weekday peak hour of activity conditions. Both Existing and Existing plus Project conditions were examined in order to get a magnitude of increase comparison for the northbound left-turn and eastbound queuing conditions.

Two different measures of the queue were determined for the queuing analysis: the average queue and the 95th percentile queue. The average queue represents the length of the queue that would form if vehicles arrived at an average, constant rate to the intersection. The 95th percentile queue represents the theoretical maximum queue length and accounts for the non-constant arrival rates of vehicles to the intersection. The 95th percentile queue is used for the design of turn pockets, as the standard is to have a pocket of sufficient length to accommodate the 95th percentile queue. Both the average queue and the 95th percentile queue lengths were calculated using a computer spreadsheet model that took into account the arrival patterns of vehicles at intersections. The results of the analysis are shown in Table 3 on page 67.

At the **southbound left-turn** from Bayshore Boulevard to the project driveway, average queues would be about 50 to 100 feet long and the maximum 95th percentile queue would be about 150 feet long, or about six to seven vehicles. As a result, the proposed left-turn pocket of 180 feet would be sufficient to accommodate the left-turning queues during the three analysis periods. With this pocket, vehicles attempting to enter the project site from southbound Bayshore Boulevard could be contained within the pocket and would not affect through traffic operations along Bayshore Boulevard.

At the **northbound left-turn** from Bayshore Boulevard to westbound Cortland Avenue, the pocket is about 140 feet long and would be extended by at least 70 feet (to a total distance of 210 feet) with the proposed project. The pocket could be potentially extended to 280 feet long. During the three analysis periods, the 95th percentile queues that currently develop at this movement (generally between 55 and 135 feet long) can all be accommodated within the existing pocket. With the proposed project, the percentage of the traffic signal's green time dedicated to the northbound left-turn movement would decrease, which would cause the queues to lengthen. On average, the queues that would develop would still be accommodated within the existing pocket. However, the 95th percentile queue would be about 205 feet long during the weekday PM peak hour and 175 feet long during the Saturday midday peak hour. The extended pocket would accommodate these queues. It is anticipated that this change would not affect operations along northbound or southbound Bayshore Boulevard.

Table 3					
Queuing Analysis at Bayshore/Cortland Intersection Existing and Existing plus Project Conditions					
Location / Time Period	Existing			Existing plus Project	
	Volume	Queue Length ¹		Volume	Queue Length ¹
		Avg.	95th		Avg. 95th
Southbound Left-Turn					
Weekday PM Peak Hour	—	—	—	95	50 80
Saturday Midday Peak Hour	—	—	—	155	100 150
Weekday Peak Hour of Act.	—	—	—	120	50 75
Northbound Left-Turn					
Weekday PM Peak Hour	250	90	135	250	135 205
Saturday Midday Peak Hour	180	55	85	180	115 175
Weekday Peak Hour of Act.	120	35	55	120	50 75
Eastbound Approach					
Weekday PM Peak Hour	290	105	155	340	185 305
Saturday Midday Peak Hour	410	105	160	490	275 460
Weekday Peak Hour of Act.	300	70	105	365	140 210

Source: Wilbur Smith Associates – March 2002

Notes:

All distances in feet

¹ Queue lengths assumes an average of 22 feet per vehicle.

At the **eastbound approach** of Cortland Avenue to Bayshore Boulevard, the 95th percentile queues that currently develop extend about 105 to 160 feet (up to the U.S. 101 overpass). With the proposed project, the addition of project-related traffic and adjustments to the signal timing would result in the lengthening of the eastbound queue. The average queues would be about 185 feet during the weekday PM peak hour and 275 feet during the Saturday midday peak hour (both of which would extend underneath the U.S. 101 overpass). The 95th percentile queues (which would occur five percent of the time during the peak hours, or about once or twice an hour) would be about 210 feet long during the weekday midday peak hour of activity, 305 feet during the weekday PM peak hour and 460 feet during the Saturday midday peak hour. This 95th percentile queue during the Saturday midday peak hour would extend past the intersection of Cortland/Peralta.

- Queues at the Cortland Avenue approach to Bayshore Boulevard may block vehicular access to the adjacent business establishments (in particular the parking lot and loading dock at the Kitchen

Appliance Center at 470 Bayshore Boulevard and the back-of-house operations at the Floorcraft Nursery at 550 Bayshore Boulevard). Since there are no cross-streets, driveways or businesses/residences between Hilton Street and Peralta Street, these queues would not substantially affect access to and from Cortland Avenue. Cortland Avenue is the only substantial east-west street through the Bernal Heights area. The queues at the eastbound approach to Bayshore Boulevard may affect overall circulation on Cortland Avenue. To avoid the queues and the associated delays at the Bayshore/Cortland intersection, drivers may divert to other routes, such as Putnam Street to Crescent Avenue. The analysis of the Bayshore/Cortland intersection and the Cortland Avenue approach accounted for the delays associated with these queues. The proposed improvements to the eastbound approach would result in the reduction of the 95th percentile queues by about 10 percent, although the resulting queues would still be lengthy (275 feet during the weekday PM peak hour and 410 feet during the Saturday midday peak hour which would extend almost to the Cortland/Peralta intersection).

In addition, the queues that would develop at the northbound left-turn from Bayshore Boulevard to westbound Cortland Avenue and along the eastbound Cortland Avenue approach to Bayshore Boulevard may delay operations of the Muni 24-Divisadero bus line. Due to the increase in traffic volumes at these movements and the proposed changes to the signal timing plan, buses (as well as other vehicles) may be required to wait to travel through the intersection during peak hours. The queues at these two locations may make it more difficult for buses to access the bus stops on Cortland Avenue, which may delay bus operations and increase wait time for passengers. However, since the eastbound Muni 24-Divisadero bus line is near the end of its line (located at Third/Oakdale) and has relatively low ridership at this location, the queuing conditions would not substantially affect Muni operations.

Potential queues that would develop at the main driveway to the proposed project (i.e., at the northbound right-turn from Bayshore Boulevard to the driveway) may force both Muni and SamTrans buses to use the center lane to avoid the queues and additional travel delays, however this would not constitute a significant impact.

TRANSIT IMPACTS

The proposed project would generate relatively few transit trips on weekdays and weekends, as transit trips to and from the proposed project would generally be limited to employees or customers

from the nearby area. As such, there is not anticipated to be an adverse increase in the number of riders on the adjacent transit lines as a result of the proposed project.

Vehicular activity generated by the proposed project may somewhat affect Muni and SamTrans operations on Bayshore Boulevard. In particular, a bus stop for the Muni 9-San Bruno and 23-Monterey bus lines is located in close proximity to the Bayshore Boulevard driveway for the proposed project's parking garage. As such, there would be a potential for conflicts between buses pulling into and out of the curb bus stop and project-related traffic turning into and out of the garage. In addition, pedestrians waiting at the bus stop would experience higher levels of vehicle activity than is currently occurring at this location. Muni staff has indicated that it wishes to maintain the bus stop at this location in order to facilitate transfers between bus lines.⁹ Since the nearest northbound SamTrans bus stop is located south of Waterloo Street, vehicles entering and exiting the project garage would not directly affect SamTrans bus operations.

Due to the increased traffic in the vicinity of the proposed project, travel times for Muni and SamTrans buses would somewhat increase. However, transit vehicles operating on Bayshore Boulevard, Cortland Avenue, Industrial Street and Oakdale Avenue would experience the same delays, queuing and levels of congestion as regular vehicular traffic, as indicated in the intersection analysis results. In addition, transit vehicles may experience minor delays pulling out from bus stops into the travel lanes as a result of the increased traffic volumes and queues.

In general, transit operations would be most affected during the peak hours of activity at the proposed project (primarily during the weekday midday and weekend midday periods). During these times, the frequency of service and the ridership of the nearby Muni and SamTrans bus lines are less than during the primary morning and evening peak commute hours. In addition, the eastbound Muni 24-Divisadero bus line is near the end of its line (located at Third/Oakdale) so the Muni schedule would not likely be affected. As a result, the potential queues that would develop at the main access routes to the proposed project and the increase in traffic volumes at the nearby intersections would not adversely affect Muni and SamTrans service levels and therefore would not result in a significant impact to transit operations.

⁹ See August 17, 2001 letter from Michael Burns (Muni) to Reuben & Alter, LLP.

The proposed improvements to eastbound Cortland Avenue (as discussed above) would not adversely affect operations of the Muni 24-Divisadero bus line. Although the bus stop would be shortened (from 120 feet to 60 feet), it would be positioned at the east side of Hilton Street so buses could use the Hilton Street right-of-way to access the bus stop. In addition, the provision of the proposed right-turn lane at the approach to Bayshore Boulevard would make it easier for buses to turn right to southbound Bayshore Boulevard, since the buses would not be required to merge back into the regular travel lane.

PARKING IMPACTS

- The proposed project would be required to provide 503 off-street parking spaces per the San Francisco *Planning Code*. In addition, the proposed project would have a maximum parking demand (for both customers and employees) of 502 spaces during the weekday midday peak period and 539 spaces during the weekend midday peak period. Since the proposed project would include 539 parking spaces, it would meet the *Planning Code* requirements and meet the anticipated parking demand.

Since there are currently driveways to the project site from Bayshore Boulevard and Loomis Street, the proposed project would not result in the elimination of any on-street parking spaces. The proposed left-turn pocket on Bayshore Boulevard into the Cortland Avenue driveway would result in the inability of northbound traffic to directly access about 12 parking spaces located at 470 Bayshore Boulevard. However, the proposed U-turn pocket would allow access to these spaces to be maintained. Currently, on-street parking spaces in the study area have an estimated utilization of 50 percent during the weekday and weekend midday periods.

PEDESTRIAN IMPACTS

Due to the nature of the Home Depot land use, it is not anticipated that many customers would walk to access the proposed project, although some employees may walk to and from work. As such, with the development of the proposed project, the number of pedestrian trips would only slightly increase in the nearby vicinity. The anticipated increase in additional pedestrians in the area could be accommodated on the existing sidewalks and crosswalks. As these facilities currently have relatively low pedestrian volumes, pedestrian conditions would continue to remain acceptable. The proposed project would not include any changes to the public sidewalks in the vicinity of the site.

With the increased volume of vehicles entering and exiting the project driveways, there would be the potential for conflicts with pedestrians along the east sidewalk of Bayshore Boulevard. However, with the relatively low pedestrian volumes along this sidewalk, there would be no adverse effect on pedestrian operations. To facilitate pedestrians crossing the Cortland Avenue entrance to the project site, pedestrian signal heads, with WALK/DON'T WALK indicators, would be installed as part of the proposed project. In addition, per request by the DPT, the entrance would be designed similar to a street instead of a driveway (i.e., the driveway would be located at street-level, instead of ramping up to curb/sidewalk level).

There would also be an increased potential for conflicts for pedestrians crossing Bayshore Boulevard at Cortland Avenue. Pedestrians crossing Bayshore Boulevard at the Cortland Avenue crosswalks currently have 20 to 25 seconds to cross the street. In addition, the intersection allows for a pedestrian phase of about 30 seconds when the pedestrian cross button is pushed. Since Bayshore Boulevard is about 100 feet wide at this location, the available crossing time is usually sufficient for pedestrians to cross the street (assuming an average walking speed of 4 feet/second). However, if a pedestrian starts to cross late in the cycle, there may not be sufficient time to complete the crossing. The existing intersection configuration provides a small island in the center of Bayshore Boulevard at the north side crosswalk which can be used by pedestrians who do not complete the crossing within the allotted signal time. With the proposed project, this island would be removed, which would eliminate the pedestrian refuge area. In addition, the proposed project would result in a substantial number of vehicles turning right and left from the project driveway (the proposed project would not increase the number of vehicles turning right and left from eastbound Cortland Avenue). As a result, without improvements, pedestrians may have difficulty crossing Bayshore Boulevard, especially during the peak activity times of the proposed project.

However, with the new signal plan for this intersection, sufficient green time would be given to accommodate pedestrian crossings. Since the Cortland Avenue approach and the proposed project garage exit approach would have separate phases, the amount of crossing time would increase (e.g., about 43 seconds during the weekday PM peak hour and 61 seconds during the Saturday midday peak hour). The proposed project would install new pedestrian signals with countdown indicators (WALK/DON'T WALK indicators which present the time remaining to cross the street) at all four crosswalks.

To further improve pedestrian operations, it may be possible to construct sidewalk bulbs at several corners of the intersection. These bulbs enhance pedestrian visibility, decrease the amount of time it takes to cross the street, and slow turning vehicles. The location of these bulbs would need to be coordinated with the Planning Department, DPT and Muni (to ensure that buses could continue to make turns and that bus stops would not be blocked).

BICYCLE IMPACTS

Per the San Francisco *Planning Code*, the proposed project would be required to provide 26 bicycle parking spaces. Since the proposed project would provide 28 bicycle spaces, it would meet the *Planning Code* requirements. These bicycle parking spaces would be provided within the parking garage. In addition, the *Planning Code* would require the proposed project to provide four showers and eight clothes lockers for employees, which the proposed project would provide within the store.

In general, due to the nature of the Home Depot land use, it is not anticipated that many customers would ride bicycles to access the proposed project, although some employees may use bicycles. With the current traffic levels on the adjacent streets, bicycle travel generally occurs without major impedance or safety problems. As the number of vehicles on Bayshore Boulevard would increase with the proposed project, the potential for conflicts between motorists and bicycles may increase, as there would be more competition for the travel lanes between bicycles, autos and trucks. This would not, however, adversely affect bicycle conditions.

LOADING IMPACTS

Based on information from a similar Home Depot store, it was estimated that the proposed project would generate 30 daily delivery trips per day (approximately 15 semi tractor-trailers and 15 small trucks/vans). The project sponsor has estimated that there would be a peak demand for four loading docks (two long-term and two short-term) at the proposed project. The San Francisco *Planning Code* requires that the proposed project provide four off-street loading spaces. The proposed project would provide four loading docks at the northeast corner of the site, plus a separate customer loading area. As such, the proposed supply of four loading docks would meet the anticipated demand and *Planning Code* requirements.

It is anticipated that most delivery vehicles would use U.S. 101 or I-280 and access the project site via the nearby on- and off-ramps. Direct access to the loading docks would be via Loomis Street. Delivery vehicles using southbound Bayshore Boulevard, therefore, would make a left-turn at the intersection of Bayshore/Oakdale and a right-turn onto Loomis Street. Delivery vehicles using northbound Bayshore Boulevard would turn right at Industrial Street and left onto Loomis Street. From Loomis Street, delivery vehicles would turn into the site and then back into the loading docks. To depart the proposed project, delivery vehicles would use either Loomis Street or the delivery truck driveway located behind the garden center (see Figures 2 and 3, pages 28 and 29), exiting northbound (right-turn only) on Bayshore Boulevard. Delivery trucks with southbound destinations could exit onto Loomis Street, turn left at Oakdale Avenue and then turn left onto Bayshore Boulevard.

Since Loomis Street is a wide street which serves numerous industrial and commercial uses, it is anticipated that project delivery trucks would be able to enter and exit the proposed loading dock area to/from Loomis Street and maneuver without adverse constraints or impacts to local vehicular circulation.

Customer Pick-Ups: A designated customer pick-up location would be established on the ground floor of the parking garage, adjacent to the main entrance of the store. Customers parking throughout the parking garage could drive their vehicles to the pick-up area and load their items directly into their vehicles. From the pick-up area, customers could drive straight and exit the site via a right-turn only driveway to northbound Bayshore Boulevard, or circle through the parking garage and exit at the main Cortland Avenue driveway. In addition, the second level of the garage would have a connection to the mezzanine level of the Home Depot store. Adjacent to the vestibules and elevators, a secondary customer pick-up area would be provided on the second level. No direct access would be provided between the rooftop parking and the store.

CONSTRUCTION IMPACTS

Construction of the proposed project is expected to take approximately 16 months, to start in 2003 and be completed by the middle of 2005. Detailed plans for construction activities have not yet been finalized; however, there would be four primary construction phases. Phase 1 would entail environmental remediation and the demolition of existing structures on the site, Phase 2 would

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include site work and foundations, Phase 3 would involve building construction and any necessary off-site construction (such as intersection or roadway improvements), and Phase 4 would consist of interior and exterior building finish and landscaping. Construction-related activities would typically occur Monday through Friday from 6:00 a.m. to 5:00 p.m. It is anticipated that activities may occur on weekends or extended hours on weekdays, if necessary.

Construction staging would occur primarily within the site. Truck loading and unloading activities would occur within the site and on Loomis Street, and would have minimal impact on the adjacent streets. Staging off Bayshore Boulevard would be minimal, only to occur on an as-needed basis. It is not anticipated that any traffic lanes, parking lanes, or sidewalks would need to be closed during the construction duration, except during demolition of existing structures, construction of the driveways to the proposed project, and construction of the Bayshore Boulevard improvements. When the driveways would be under construction, pedestrians would need to be routed to the west side of Bayshore Boulevard or to a temporary sidewalk within the Bayshore Boulevard right-of-way (which would require the temporary closure of the adjacent parking lane).

If it is determined that temporary traffic lane closures would be needed, the closures would be coordinated with the City in order to minimize the impacts on local traffic. In general, lane and sidewalk closures are subject to review and approval by the Department of Public Works (DPW) and the Interdepartmental Staff Committee on Traffic and Transportation (ISCOTT). It is anticipated that the Muni bus stop located on Bayshore Boulevard directly in front of the vacant Goodman Lumber building may need to be temporarily relocated during some construction phases of the proposed project. During these times, if it is determined that a temporary Muni bus stop relocation would be needed, it would be coordinated with the Muni Street Operations/Special Events office. The project sponsor would work with Muni and the appropriate City staff to determine the best location and the time duration of any bus stop relocation.

During the construction period, there would be a flow of construction-related trucks into and out of the site. The impact of construction traffic would vary as the stages of the proposed project construction are completed. The impacts of construction truck traffic would be a lessening of the capacities of the local access streets and haul routes, due to slower movements and larger turning radii of the trucks, which may temporarily affect local traffic and transit operations. Most

construction traffic would not occur during the peak traffic periods and construction traffic would not be significant.

It is anticipated that a majority of the construction-related truck traffic would use U.S. 101, I-280 or Bayshore Boulevard to access the project site. From northbound U.S. 101, trucks would likely use the off-ramps to Alemany Boulevard, and to access northbound U.S. 101, trucks would likely use the on-ramp from Alemany Boulevard or Cesar Chavez Street. From southbound U.S. 101, trucks would likely use the off-ramp to Cesar Chavez Street/Bayshore Boulevard, and to access southbound U.S. 101, trucks would likely use the on-ramps at Alemany Boulevard.

During the peak construction period, there are estimated to be 30 to 40 workers per day at the site. Trip distribution and mode split data are not available for the construction workers. However, the addition of worker-related vehicles or transit trips would not adversely affect the transportation network. Construction-worker parking would be provided within the project site and nearby on-street parking.

2015 Cumulative Conditions

Cumulative traffic growth would occur from other developments in the area, as well as from the proposed project.¹⁰ For the development of future 2015 Cumulative traffic volumes, a growth rate of 1.0 percent per year was used including project traffic (per direction of the San Francisco Planning Department), plus adjustments to the growth at specific movements in the study intersections to account for greater potential cumulative growth. The growth rate was based on the Planning Department's experience with traffic volumes throughout the City and is consistent with historic traffic volume counts along Bayshore Boulevard. These future traffic volumes were used to forecast the levels of service at the freeway on-ramps and study intersections under 2015 Cumulative conditions.

¹⁰ It should be noted that when the existing traffic counts were conducted for this project, the nearby OfficeMax store at 625 Bayshore Boulevard was in business. At the time the analysis for this report was conducted, the Planning Department had not received any project information or future development plans for any sites along Bayshore Boulevard, including the OfficeMax site.

It is anticipated that this growth rate would account for the possible future diversion of truck traffic from Third Street to Bayshore Boulevard as anticipated in the *Bayview Hunters Point Community Revitalization Concept Plan*.¹¹ As part of the plan, a new truck route plan was developed to reduce the effect of truck traffic on Third Street, in conjunction with the upcoming Muni Third Street light rail and the revitalization of the main residential/commercial district. Currently, trucks use Third Street to travel between U.S. 101 and downtown San Francisco, and to access the industrial/commercial establishments in Hunters Point and along Third Street. In general, the new truck route plan calls for restricting trucks of over 11,000 pounds from Third Street and establishing a new north-south truck route along Bayshore Boulevard and Fitch Street (including a new bridge over Yosemite Slough), and a new east-west truck route along Cesar Chavez Boulevard, Evans Avenue and Carroll/Underwood Avenues. The proposed project is in the San Francisco Redevelopment Agency's South Bayshore Survey Area. The *Bayview Hunters Point Community Revitalization Concept Plan* is an advisory plan for the Redevelopment Agency.

As part of the environmental assessment of the Muni Third Street light rail project,¹² information regarding truck activity on Third Street was obtained.¹³ During the weekday AM peak hour, there were about 1,700 vehicles on Third Street, of which 11 percent were trucks (a total of about 190 trucks), and during the weekday PM peak hour, there were about 1,750 vehicles on Third Street, of which five percent were trucks (a total of about 80 trucks). A license plate survey was conducted to determine the amount of through traffic that travels on Third Street between Gilman and Evans Streets (i.e., traffic that travels through the main residential/commercial district). From this survey, it was estimated that ten percent of all commercial vehicles were through trips during the AM peak period and eight percent of all commercial vehicles were through trips during the PM peak period. In other words, almost 90 percent of all commercial vehicles on Third Street were determined to have a local origin or destination.

¹¹ San Francisco Redevelopment Agency Planning Division, *Bayview Hunters Point Community Revitalization Concept Plan – Final Draft*, November 2000.

¹² *Third Street Light Rail Project EIS/EIR*, 1999.

¹³ All truck percentages and hourly traffic volumes on Third Street at Palou Avenue, from 1996 and 1997 counts.

Although the goal of the new truck route plan is to reduce the number of trucks using Third Street, it would not be feasible for trucks that are destined to and from specific locations on Third Street to relocate to one of these new truck routes. As a result, it is anticipated that the implementation of the truck route plan would result in only a minor increase in truck volumes along Bayshore Boulevard (up to 20 trucks during the weekday AM peak hour and 10 trucks during the weekday PM peak hour). These increases are within the growth in traffic volumes estimated for Bayshore Boulevard.

Freeway On-Ramps: The anticipated increase in traffic volumes along U.S. 101, I-280 and the study on-ramps in 2015 would add to the existing congestion on the regional freeway system and cause breakdown in operations at locations where excess capacity currently exists. The addition of the traffic generated by the proposed project to the freeway on-ramps would contribute to the levels of congestion.

Table 4 on page 78 presents the 2015 Cumulative freeway on-ramp levels (based on the one percent growth rate plus adjustments¹⁴) for weekday PM peak hour and Saturday midday peak hour conditions. Under the 2015 Cumulative conditions, all five of the study freeway on-ramps would operate at LOS F during the weekday PM peak hour and two of the on-ramps would operate at LOS F during the Saturday midday peak hour. Two of the study on-ramps operate at LOS F under existing conditions: the westbound I-280 on-ramp from Alemany during the weekday PM peak hour and the northbound U.S.101 on-ramp from Bayshore/Cesar Chavez during the Saturday midday peak hour. At LOS F, there would be frequent breakdown of the traffic flow at the freeway-ramp junction, resulting in low speeds on the freeway and the formation of queues along the ramps. The poor operating conditions at these on-ramp locations would be a result of high freeway mainline and ramp volumes.

Intersections: As shown in Table 5 on page 78, under the 2015 Cumulative conditions (including the project) during the weekday PM peak hour and the Saturday midday peak hour, all study intersections would operate acceptably (LOS D or better), except the intersection of Mission/Cortland, which would operate at LOS F.

¹⁴ Adjustments that account for anticipated growth in certain areas that could contribute more than one percent trip generation at certain intersections.

Table 4 Freeway On-Ramp Levels of Service with Project 2015 Cumulative Conditions – Weekday PM and Saturday Midday Peak Hours				
On-Ramp Location	Weekday PM		Saturday Midday	
	LOS	Density	LOS	Density
A. U.S. 101 NB @ Alemany/Industrial	F	*	C	24
B. U.S. 101 NB @ Bayshore/Cesar Chavez	F	*	F	*
C. U.S. 101 SB @ Alemany/Industrial	F	*	F	*
D. U.S. 101 SB @ San Bruno	F	*	C	20
E. I-280 WB @ Alemany	F	*	B	18

Source: Wilbur Smith Associates – September 2001/March 2002

Notes:

Density presented in passenger cars per minute per lane (pcpmpl).

* Unstable flow – density cannot be calculated.

Table 5 Intersection Levels of Service with Project 2015 Cumulative Conditions – Weekday PM and Saturday Midday Peak Hours				
Intersection	Weekday PM		Saturday Midday	
	Delay ¹	LOS	Delay ¹	LOS
Signalized Intersections				
1. Bayshore/Jerrold/US101 NB off	34.4	D	35.0	D
2. Bayshore/Oakdale	33.9	D	22.6	C
3. Bayshore/Cortland	36.0	D	39.7	D
4. Bayshore/Industrial	37.5	D	24.4	C
5. Bayshore/Silver	38.7	D	12.4	B
6. Alemany/Putnam/US101 SB off	16.8	C	25.5	D
7. Alemany/San Bruno/US101 SB on	26.1	D	29.7	D
8. Alemany/Cut-Thru/S101 NB off	5.3	B	4.7	A
9. Industrial/Cut-Thru	5.7	B	4.8	A
10. Mission/Cortland	>60	F	>60	F
STOP-Controlled Intersections				
11. Cortland/Andover ²	16.5	C	23.1	D
12. Cortland/Folsom ²	9.8	B	9.8	B
13. Oakdale/Loomis ³	26.7	D	11.4	C
14. Industrial/Loomis ⁴	14.0	C	7.6	B

Source: Wilbur Smith Associates – March 2002

Notes:

¹ Delay presented in seconds per vehicle

² Delay and LOS presented for worst STOP-controlled approach

³ Delay and LOS presented for northbound approach

⁴ Delay and LOS presented for southbound approach

Contribution to Future Conditions: As a means to assess the effect of project-generated traffic on 2015 Cumulative conditions, the proposed project's percent contribution to the 2015 Cumulative traffic volumes was determined. Two different percent contributions were calculated: the project-generated traffic as a percent of the total 2015 Cumulative traffic volumes, and the project-generated traffic as a percent of only the increase in traffic volumes between Existing and 2015 Cumulative conditions. The results are shown in Table 6 on page 80. Although both calculations present the project's contribution to traffic volumes, only the increase in traffic volumes between Existing and 2015 Cumulative conditions is used to determine the significance of the project's impacts.

As shown in Table 6, the proposed project would contribute to the growth in traffic volumes between Existing and 2015 Cumulative conditions. At the study freeway on-ramps, the proposed project would contribute between 9 and 62 percent during the weekday PM peak hour and between 15 and 59 percent during the Saturday midday peak hour. At the study intersections, the proposed project would contribute between 18 and 61 percent during the weekday PM peak hour and between 25 and 75 percent during the Saturday midday peak hour. The greatest contribution would be at the intersections along Bayshore Boulevard and especially at the intersection of Bayshore/Cortland (through which almost all project-related traffic would travel). The proposed project's contribution would be higher during the Saturday midday peak hour than the weekday PM peak hour as a result of lower existing traffic volumes and an anticipated smaller growth in background traffic volumes.

The proposed project would have a significant contribution to the poor operating conditions (LOS F) at the intersection of Mission/Cortland during both the weekday PM peak hour (23.5 percent of growth) and Saturday midday peak hour (30.9 percent of growth). It would be possible to mitigate the 2015 cumulative impacts at the intersection of Mission/Cortland by establishing a protected left-turn phase (in conjunction with the existing left turns). With this mitigation, the intersection would operate at LOS C during the weekday PM peak hour and LOS D during the Saturday midday peak hour. As a result, the proposed project's significant contribution to the poor operating conditions at this location would be considered a significant, but mitigable impact.

The proposed project would have a significant contribution to the poor operating conditions at all study freeway on-ramp locations that would operate at LOS F under 2015 Cumulative conditions, since the proposed project would contribute more than five percent to the increase in freeway on-

Table 6 Proposed Project's Contribution to Traffic Volumes 2015 Cumulative Conditions – Weekday PM and Saturday Midday Peak Hours										
Location	Weekday PM					Saturday Midday				
	Existing	Project	2015 Cum.	% of Total	% of Growth	Existing	Project	2015 Cum.	% of Total	% of Growth
Freeway On-Ramp										
US101 NB @ Alemany/Ind.	433	13	498	2.6%	20.0%	552	18	635	2.8%	21.7%
US101 NB @ Bayshore/CC	1,452	19	1,670	1.1%	8.7%	1,210	27	1,392	1.9%	14.9%
US101 SB @ Alemany/Ind.	284	57	377	15.1%	61.6%	227	79	361	21.9%	58.9%
US101 SB @ San Bruno	191	14	230	6.1%	36.2%	212	19	259	7.3%	40.6%
I-280 WB @ Alemany	1,067	37	1,227	3.0%	23.1%	856	51	984	5.2%	39.7%
Intersection										
Bayshore/Jerrold/US101	3,068	103	3,528	2.9%	22.4%	3,495	143	4,069	3.5%	24.9%
Bayshore/Oakdale	3,456	207	4,024	5.1%	36.4%	2,741	308	3,332	9.2%	52.1%
Bayshore/Cortland	2,926	675	4,040	16.7%	60.6%	2,308	1,010	3,664	27.6%	74.5%
Bayshore/Industrial	4,286	472	5,229	9.0%	50.1%	3,021	707	4,079	17.3%	66.8%
Bayshore/Silver	3,033	165	3,553	4.6%	31.7%	2,015	247	2,532	9.8%	47.8%
Alemany/Putnam/US101	3,403	161	3,923	4.1%	30.9%	3,031	242	3,706	6.5%	35.9%
Alemany/San Bruno/US101	2,248	168	2,745	6.1%	33.8%	2,144	251	2,766	9.1%	40.4%
Alemany/Cut-Thru/US101	1,898	150	2,303	6.5%	37.1%	1,747	239	2,309	10.4%	42.5%
Industrial/Cut-Thru	2,087	161	2,400	6.7%	51.4%	1,300	223	1,695	13.2%	56.5%
Mission/Cortland	1,888	90	2,271	4.0%	23.5%	1,821	134	2,254	5.9%	30.9%
Cortland/Andover	936	98	1,201	8.2%	36.9%	845	147	1,147	12.8%	48.7%
Cortland/Folsom	761	106	1,010	10.5%	42.5%	718	159	1,006	15.8%	55.3%
Oakdale/Loomis	1,643	58	1,959	3.0%	18.3%	1,314	87	1,911	5.4%	29.3%
Industrial/Loomis	1,626	97	1,990	4.9%	26.7%	1,110	150	1,457	10.3%	43.3%

Source: Wilbur Smith Associates -- March 2002

ramp volumes at each location. During the weekday PM peak hour, the traffic generated by the proposed project would have a significant contribution at the northbound U.S. 101 on-ramp at Alemany Boulevard/Industrial Street, the northbound U.S. 101 on-ramp at Bayshore Boulevard/Cesar Chavez Street, the southbound U.S. 101 on-ramp at Alemany Boulevard/Industrial Street, the southbound U.S. 101 on-ramp at San Bruno and the westbound I-280 on-ramp at Alemany Boulevard. During the Saturday midday peak hour, the proposed project would have a substantial contribution at the northbound U.S. 101 on-ramp at Bayshore Boulevard/Cesar Chavez Street and the southbound U.S. 101 on-ramp at Alemany Boulevard/Industrial Street. These impacts are unmitigable.

C. AIR QUALITY

Setting

APPLICABLE REGULATIONS

The Federal Clean Air Act Amendments of 1970 established national ambient air quality standards, and individual states retained the option to adopt more stringent standards and to include other pollution species. California had already established its own air quality standards when federal standards were established, and because of the unique meteorological problems in the state, there is considerable diversity between state and federal standards currently in effect in California, as shown in Table 7 on page 82.

The Bay Area has both a federal and state air quality plan. Both plans propose the imposition of controls on stationary sources (factories, power plants, industrial sources, etc.) and Transportation Control Measures designed to reduce emissions from automobiles.

- The ambient air quality standards are intended to protect public health and welfare. They are designed to protect those segments of the public most susceptible to respiratory distress, known as sensitive receptors. The Bay Area Air Quality Management District (BAAQMD) defines sensitive receptors as facilities where sensitive receptor population groups (children, the elderly, the acutely ill, the chronically ill, and persons engaged in strenuous work or exercise) are likely to be located. These land uses include residences, schools, playgrounds, child care centers, retirement homes, convalescent homes, hospitals and medical clinics. Healthy adults can tolerate occasional exposure to air pollution levels somewhat above ambient air quality standards before adverse health effects are

III. ENVIRONMENTAL SETTING AND IMPACTS

AIR QUALITY

observed. The closest sensitive receptor to the project site is the Big City Montessori School located at 240 Industrial Street at the northeast corner of Loomis Street, about 300 feet south of the project site. The nearest residential area is in Bernal Heights approximately 500 feet west of the project site and west of the U.S. 101 Freeway.

Table 7
State and Federal Ambient Air Quality Standards

Pollutant	Averaging Time	SAAQS ^{1,3}	NAAQS ^{2,3}
Ozone	1 hour	0.09 ppm	0.12 ppm
Carbon Monoxide (CO)	1 hour	20 ppm	35 ppm
	8 hour	9.0 ppm	9 ppm
Nitrogen Dioxide (NO ₂)	1 hour	0.25 ppm	NA
	Annual	NA	0.053 ppm
Sulfur Dioxide (SO ₂)	1 hour	0.25 ppm	NA
	3 hour	NA	0.5 ppm
	24 hour	0.04 ppm	0.14 ppm
	Annual	NA	0.03 ppm
Inhalable Particulate Matter (PM ₁₀)	24 hour	50 µg/m ³	150 µg/m ³
	Annual	20 µg/m ³	50 µg/m ³
Sulfates	24 hour	25 µg/m ³	NA
Lead	30 day	1.5 µg/m ³	NA
	Calendar Quarter	NA	1.5 µg/m ³
Hydrogen Sulfide	1 hour	0.03 ppm	NA
Vinyl Chloride	24 hour	0.010 ppm	NA

Source: BAAQMD Website, <http://www.baaqmd.gov/tech/am/aqstand.htm> (last updated 12/30/96)

Notes:

- ¹ SAAQS stands for State Ambient Air Quality Standards (California). SAAQS for ozone, carbon monoxide, sulfur dioxide (1-hour and 24-hour), nitrogen dioxide, and inhalable particulate matter are values that are not to be exceeded. All other state standards shown are values not to be equaled or exceeded.
- ² NAAQS stands for National Ambient Air Quality Standards. NAAQS, other than ozone and those based on annual averages, are not to be exceeded more than once a year. The ozone standard is attained when the fourth highest eight hour concentration in a year, averaged over three years, is equal to or less than the standard. For PM₁₀, the 24 hour standard is attained when 99 percent of the daily concentrations, averaged over three years, are equal to or less than the standard.
- ³ ppm = parts per million by volume; µg/m³ = micrograms per cubic meter; NA = Not Applicable.

AIR QUALITY POLLUTANTS

The BAAQMD operates a regional monitoring network that measures the ambient concentrations of six air pollutants which are the primary pollutants that affect air quality (the “criteria pollutants”): ozone (O_3), carbon monoxide (CO), fine particulate matter (PM_{10}), lead (Pb), nitrogen dioxide (NO_2) and sulfur dioxide (SO_2). Reactive organic gases (ROG also known as reactive hydrocarbons), nitrogen oxides (NO_x including NO_2),¹ and PM_{10} are precursors to ozone.

Toxic air contaminants are less pervasive in the urban atmosphere than criteria air pollutants, but are linked to short-term (acute) or long-term (chronic and/or carcinogenic) adverse human health effects. There are hundreds of different types of toxic air contaminants, with varying degrees of toxicity. Sources of toxic air contaminants include industrial processes, commercial operations (e.g. gasoline stations and dry cleaners), and motor vehicle exhaust. Unlike regulations concerning criteria air pollutants, there are no regulatory standards for toxic air contaminants based on the mass of emissions. Instead, emissions of toxic air contaminants are evaluated based on the degree of health risk that could result from exposure to these pollutants.

Pollutants can be classified as being local or regional pollutants. Local pollutants are relatively inert in the atmosphere, and concentrations are primarily determined by distance from the source. Regional pollutants undergo transformation in the atmosphere or may be formed in the atmosphere, so that concentrations are dependant on the total regional emissions and weather patterns rather than the actual location of the emissions. Carbon monoxide is a localized pollutant whose major source is automobiles, so concentrations of this gas are highest near intersections of major roads. PM_{10} is both a local and regional pollutant, having both a relatively inert component and a photochemically-produced component. Particulate levels are relatively low near the coast and increase with distance from the coast, peaking in dry, sheltered valleys. The primary sources of particulates in San Francisco are construction and demolition, combustion of fuels for heating, and vehicle travel over paved roads.² Ozone (of regional rather than local concern) is not emitted directly from air pollutant

¹ Nitrogen Oxides are a class of pollutants comprised of N and O. Of the several nitrogen oxides, only one (NO_2) is considered a primary pollutant with a specific AQ standard. All nitrogen oxides are contributors to ozone formation.

² Bay Area Air Quality Management District, *BAAQMD CEQA Guidelines, Assessing the Air Quality Impacts of Projects and Plans*, December 1999.

sources, but is produced in the atmosphere over time and distance through a complex series of photochemical reactions involving reactive organic gases (ROG) and nitrogen oxides (NO_x), which are carried downwind as the photochemical reactions occur. Thus, ozone impacts are based on the emissions of these precursors. Regional ozone standards are violated most often in the Santa Clara, Livermore and Diablo Valleys, because local topography and meteorological conditions favor the build-up of ozone precursors there.

AIR QUALITY CONDITIONS

Existing and probable future levels of air quality in the City can be generally inferred from ambient air quality measurements conducted by the BAAQMD at its two San Francisco monitoring stations. The Potrero Hill station at 10 Arkansas Street measures all criteria pollutants, including regional pollution levels (ozone), as well as primary vehicular emission levels near busy roadways for CO. The station at 939 Ellis Street at BAAQMD Headquarters measures only CO. Table 8, on page 85, summarizes four years of published data (1998 to 2001) from these monitoring stations. During this four-year period, there were no violations of the one-hour or eight-hour CO standards at the Arkansas Street and Ellis Street monitoring stations. The state PM_{10} standard was exceeded on one to 13 days each year during the four-year period between 1998 and 2001. Ozone, nitrogen dioxide, and particulate sulfate measurements were within allowable maximum concentrations.

Comparison of these data with those from other BAAQMD monitoring stations indicates that San Francisco's air quality is among the least degraded of all developed portions of the Bay Area. Three of San Francisco's four prevailing winds, west, northwest and west-northwest, blow from the Pacific Ocean, reducing the potential for San Francisco to receive air pollutants from elsewhere in the region.

Data from air quality monitoring in San Francisco show that there have been occasional local exceedances of state PM_{10} standards, largely due to emissions from within the City. The primary sources of PM_{10} in San Francisco are construction and demolition activities, combustion of fuels for heating, and vehicle travel over paved roads.

Table 8
San Francisco Air Pollutant Summary, 1999-2002

Pollutant	Standard	Monitoring Data by Year ¹			
		1999	2000	2001	2002
Ozone					
Highest 1-hr average, ppm	0.09 ²	0.08	0.06	0.06	0.04
Number of standard excesses		0	0	0	0
Highest 8-hr average, ppm	0.08	0.08	0.05	0.05	0.05
Number of standard excesses		0	0	0	0
Carbon Monoxide					
Highest 8-hr average, ppm	9.0 ²	4.2	3.2	3.3	2.6
Number of standard excesses		0	0	0	0
Nitrogen Dioxide					
Highest 1-hr average, ppm	0.25 ²	0.10	0.07	0.07	0.08
Number of standard excesses		0	0	0	0
Sulfur Dioxide					
Highest 1-hr average, ppm	0.05 ²	0.007	0.005	0.007	0.006
Number of standard excesses		0	0	0	0
Particulate Matter (PM₁₀)					
Highest 24-hr average, µg/m ³	50 ²	78	53	67	74
Number of standard excesses		6	2	7	2
Annual Geometric Mean, µg/m ³	30 ²	22.7	21.7	22.9	18.7
Particulate Matter (PM_{2.5})					
Highest 24-hr average, µg/m ³	65	47.9	76.6	70	n/a
Number of standard excesses		0	2	4	
Annual Geometric Mean, µg/m ³	15 ⁴	11.4	11.5	13.1	

Source: California Air Resources Board, Aerometric Data Analysis & Management (ADAM), 2003; and Bay Area Air Quality Management District, Bay Area Air Pollution Summary, 1999-2002.

Notes:

ppm = parts per million; µg/m³ = micrograms per cubic meter.

n/a = Not applicable or does not exist.

¹ All data were collected at the Arkansas Street Station.

² State standard, not to be exceeded.

³ State standard was revised downward to 20 µg/m³ effective July 5, 2003.

⁴ State of California adopted a more stringent annual average standard of 12 µg/m³, which became effective July 5, 2003. Therefore, there were no exceedances in 1999 and 2000.

The Federal Clean Air Act and the California Clean Air Act of 1988 require that the State Air Resources Board, based on air quality monitoring data, designate portions of the state where the federal or state ambient air quality standards are not met as “non-attainment areas.” Because of the differences between the national and state standards, the designation of nonattainment areas is

different under the federal and state legislation. On the basis of the monitoring data, the Bay Area had been designated a “non-attainment” area with respect to the Federal O₃ and CO standards. The Bay Area was subsequently re-classified as a “maintenance” area for CO.³ The air basin is an attainment area or is unclassified for all other national ambient air quality standards.

Under the California Clean Air Act, the entire San Francisco Bay Air Basin is a nonattainment area for ozone and PM₁₀. The air basin is either in attainment or unclassified for other pollutants under state standards. In addition, San Francisco has experienced violations of the state PM₁₀ standards.

In 2000, emissions from motor vehicles were the source of 70 percent of the CO, 41 percent of the HCs, 72 percent of the PM₁₀, 89 percent of the sulfur oxides and 53 percent of the NO_x emitted in San Francisco.⁴

Impacts

Air quality impacts from land development projects result from project construction and operation. Construction emissions, primarily dust generated by earthmoving activities and criteria air pollutants emitted by construction vehicles, would have a short-term effect on air quality. Operational emissions, generated by project-related traffic and by combustion of natural gas for building space and water heating, would continue to affect air quality throughout the lifetime of the project.

SIGNIFICANCE CRITERIA

The operation of a project would have a significant effect on the environment with respect to air quality if it would violate any ambient air quality standard or contribute substantially to an existing or projected air quality violation, or expose sensitive receptors to substantial pollutant concentrations. The BAAQMD specifies the significance criteria as follows⁵: (1) the project impacts would be

³ Re-designation of a non-attainment area to a maintenance area involves approval of a maintenance plan outlining emission control programs that will maintain the Federal ambient air quality standard for ten years after re-designation. The plan must describe the measures that will be taken to correct violations of the air quality standards, if they occur.

⁴ California Air Resources Board, *2001 Estimate Annual Average Emissions, San Francisco County*, 2002.

⁵ BAAQMD CEQA Guidelines, *op. cit.*

considered significant if they cause operation-related emissions equal to or exceeding an established threshold of 80 pounds per day of ROG, NO_x, or PM₁₀, (ozone precursors) or cause CO concentrations to exceed the state ambient air quality standards of more than 550 pounds per day of emissions; and (2) the project impacts would also be considered to have a significant contribution to cumulative regional air quality effects if the project impacts exceed these standards.

With respect to toxic pollutants, a project would be deemed to have a significant impact if the incremental probability of contracting cancer for the Maximally Exposed Individual (MEI) exceeds 10 in one million, or ground level concentrations of non-carcinogenic toxic air contaminants would result in a Hazard Index greater than one for the MEI.

The BAAQMD is vested by the California Legislature with authority to regulate airborne pollutants through both inspection and law enforcement, and is to be notified ten days in advance of any proposed demolition and must be provided information on the amount and nature of any hazardous pollutants, nature of planned work and methods to be employed, and the name and location of the waste disposal site to be used. The purpose of BAAQMD regulations is the minimization of the potential hazards to the public and surrounding land uses. The BAAQMD significance threshold for construction dust impacts is based on the appropriateness of construction dust controls. The BAAQMD guidelines provide feasible control measures for construction emissions of PM₁₀. If the appropriate construction controls are to be implemented, then air pollutant emissions for construction activities would be considered less-than-significant.

METHODOLOGY

Estimates of regional emissions generated by project traffic were made using the methodology recommended by the BAAQMD for calculation of mobile source emissions. Daily emissions of pollutants from project-related traffic in 2003 and 2015 were estimated using a program called URBEMIS 2001 developed by the California Air Resources Board. Inputs to the URBEMIS 2001 program included daily trip generation rates, vehicle mix, average trip length by trip type and average speed. Daily and weekend trip generation rates for project land uses were provided in the project transportation analysis. Average trip lengths and vehicle mixes for the Bay Area were used. Average speed for all types of trips was assumed to be 25 miles per hour. The analysis is

conservative in that it assumed a year 2002 vehicle mix, whereas in future years the vehicle fleet is expected to include fewer high-polluting vehicles, resulting in lower levels of emissions.

A computer program, the URBEMIS-7G, developed by the California Air Resources Board, was applied to project daily trip generation under winter conditions (the time of maximum CO concentrations) to estimate total project-related carbon monoxide emissions. The assumption was made that all trips generated by the project would be entirely new (i.e., trips generated by past uses of the site were not included).

Toxic air contaminant risks associated with increased diesel truck traffic were estimated using the EPA-approved ISCST-3 computer model.⁶ This model provides estimates of concentrations considering site and source geometry, source strength, distance to the sensitive receptors and building wake effects on emission plume dispersion. Diesel particulate emissions from trucks operating within the proposed project's loading dock area and along Loomis Street east of the project site were estimated and assumed to be emitted by a series of area sources approximating the geometry of the loading dock area and travel lanes of Loomis Street. Concentrations were calculated by the model for a series of receptors along the east side of Loomis Street, seven feet back from the curb and approximately thirty-eight feet apart from the intersection of Waterloo Street to about 150 feet north of the project site. The ISCST-3 model, the assumptions in its use and the methodology used in estimating risk are included in Appendix C.

CONSTRUCTION IMPACTS

The proposed project would require demolition of existing buildings. The physical demolition of existing structures and other infrastructure are construction activities with a high potential for creating air pollutants. In addition to the dust created during demolition, substantial dust emissions could be created as debris is loaded into trucks for disposal.

The air pollutant construction control measures for the proposed project are listed on pages 106 and 107, and include such actions as spraying the project site with water during excavation, grading, and site preparation activities; covering stockpiles of soil, sand, and other such material; covering trucks

⁶ U. S. Environmental Protection Agency, User's Guide for the Industrial Source Complex (ISC3) Dispersion Models, Report EPA-454/b-95-003a, September 1995.

hauling debris, soils, sand or other such material; sweeping surrounding streets; and maintaining and operating construction equipment so as to minimize exhaust emissions of particulates and other pollutants.

The project must also comply with California Occupational Safety and Health Administration (Cal/OSHA) regulations, standards and procedures and California Department of Health Services (DHS) Lead Work Practice Standards. These regulations are designed to minimize worker and general public exposure to hazardous building materials.

The above regulations and procedures, already established and enforced as part of the permit review process, and mitigation measures proposed as part of the project, would ensure that any potential impacts due to asbestos, lead, PM₁₀ or other hazardous materials would be less than significant.

PROJECT OPERATION IMPACTS

Project operation would affect local air quality by increasing the number of vehicles on project-impacted roads and at the project site, and by introducing stationary emissions to the project site. Transportation sources, such as project-generated vehicles, would account for over 90 percent of operational project-related emissions. Stationary source emissions, generated by combustion of natural gas for building space and water heating, would be less-than-significant, due to the low amount of emissions and the relative minimal amount of pollutants in natural gas combustion.

Local Impacts

Project-related traffic may result in areas with high concentrations of carbon monoxide around stagnation points such as major intersections and heavily traveled and congested highways. The BAAQMD has identified three threshold standards, any one of which would require the estimation of local carbon monoxide concentrations⁷:

- Project related vehicle CO emissions would exceed 550 pounds per day.
- Project traffic would impact intersections or roadway links operating at Level of Service (LOS) D, E or F or would cause LOS to decline to D, E or F.

⁷ Ibid.

- Project traffic would increase traffic volumes on nearby roadways by 10 percent or more.

The resulting calculated emissions of 781 pounds/day of carbon monoxide from project-generated vehicles would exceed the BAAQMD criterion of 550 pounds/day, and project traffic would contribute to the traffic delays at intersections currently operating at or would cause LOS to decline to LOS D, E or F. Therefore, since two of the BAAQMD criteria for modeling were met, the CO concentrations at the four qualifying intersections were estimated using a screening form of the computer model developed by the California Department of Transportation, CALINE-4.

CO concentrations are localized and strongly dependent on local traffic volumes and operating conditions. Table 9 on page 91 shows predicted one-hour and eight-hour averaged CO concentrations at the four study intersections that meet the BAAQMD criteria for modeling. The data is for worst-case intersections, at the edge of the curb immediately adjacent to traffic. Concentrations at other locations further from the roadway would be less than those shown in Table 9. For the study intersections, the estimated CO concentrations with project-generated traffic would be below the applicable state/federal standards (20 parts per million [ppm] for the 1-hour standard and 9 ppm for the 8-hour standard), and would be a less-than-significant impact.

Concentrations in 2015 would be below current levels, despite increased traffic, due to gradually declining emission rates for vehicles and background concentrations as older, more polluting vehicles are retired and replaced with lower-emitting vehicles.

The proposed parking garage would be another area of increased carbon monoxide due to slow vehicle travel and vehicle idling. The density of emissions would be far below that occurring at street intersections near the project site. The *San Francisco Building Code* sets requirements to ensure adequate ventilation and avoid accumulation of pollutants and explosive gasoline vapors and would ensure that public exposure to garage exhausts would not represent a significant impact.

Table 9 Existing and Projected Curbside Carbon Monoxide Concentrations at Selected Intersections*						
Intersection	Existing (2001)		Existing + Project (2001)		Cum. + Project (2015)	
	1-Hour	8-Hour	1-Hour	8-Hour	1-Hour	8-Hour
Bayshore/Oakdale	8.7	5.9	8.9	6.0	6.6	4.5
Bayshore/Cortland	8.3	5.6	8.7	5.9	6.5	4.4
Bayshore/Industrial	8.8	6.0	9.2	6.2	6.8	4.6
Bayshore/Jerrold/US 101	8.5	5.8	8.6	5.8	6.5	4.4
Most Stringent Standard	20.0	9.0	20.0	9.0	20.0	9.0

- * Calculations were made using a screening procedure contained in the *BAAQMD CEQA Guidelines*. Background concentrations of 6.3 ppm (1-hour) and 4.2 ppm (8-hour) were calculated using 1992 isopleths of carbon monoxide concentration and rollback factors for the year 2002 developed by the BAAQMD. Background concentrations of 5.2 ppm (1-hour) and 3.5 ppm (8-hour) were calculated using 1992 isopleths of carbon monoxide concentration and rollback factors for the year 2015 developed by the BAAQMD. The one-hour state standard is 20 ppm, the one-hour federal standard is 35 ppm, and the eight-hour state and federal standards are 9 ppm. Emission factors were derived from the California Air Resources Board EMFAC7G computer model (Version 1.0c).

Source: Don Ballanti, Certified Consulting Meteorologist.

Regional Impacts

Project traffic would also have an effect on air quality outside the project vicinity. Trips to and from the project would contribute to air pollutant emissions over the entire Bay Area. As noted above, the Bay Area is currently designated nonattainment for ozone and PM₁₀. The project associated emissions for two of the major ozone precursors (ROG and NO_x) and for PM₁₀ were evaluated using the URBEMIS-2001 computer program. The daily increases in regional emissions from project generated auto travel are shown in Table 10 on page 92. The proposed project would exceed the BAAQMD established threshold of significance of 80 pounds per day for emissions of reactive organic gases (ROG) and would be considered to have a significant adverse environmental effect on air quality. This significant impact would occur regionally within the multi-county air basin and would not be reflective of local conditions in San Francisco.

<p align="center">Table 10 Project Regional Emissions in Pounds Per Day*</p>			
	Reactive Organic Gases (ROG)	Nitrogen Oxides (NO_x)	Fine Particulate Matter (PM₁₀)
Project Daily Emission	84.5	67.1	36.2
BAAQMD Threshold	80.0	80.0	80.0

* Estimates of regional emissions generated by project traffic were made using a program called URBEMIS 2001. Inputs to the URBEMIS 2001 program include trip generation rates, vehicle mix, average trip length by trip type and average speed. Trip generation rates for project land uses were provided by the project transportation consultant. Average trip lengths and vehicle mixes for the Bay Area were used. Average speed for all types of trips was assumed to be 25 MPH, which represents a maximum level of emissions. The analysis assumed a year 2005 vehicle mix (estimate first year of project operation). The URBEMIS 2001 runs assumed summertime conditions for ROG, NO_x and PM₁₀ when ozone concentrations are maximum.

Source: Don Ballanti, Certified Consulting Meteorologist.

Toxic Air Contaminant Impacts

The highest calculated cancer risk due to diesel exhaust particulate was estimated as 0.52 in one million for the maximally exposed individual (point of maximum exposure for an offsite worker) along Loomis Street (see Appendix C). Predicted worst-case concentrations were below the chronic inhalation Reference Exposure Level (REL) for diesel exhaust particulate. The REL is the concentration at or below which no adverse non-cancer health effects are anticipated. Based on modeling for what is believed to be the worst-case location, project impacts related to toxic air contaminants would be well below the BAAQMD thresholds of significance and would be less-than-significant.

Cumulative Impacts

According to BAAQMD significance criteria, any proposed project that would individually have a significant air quality impact would also be considered to have a significant cumulative air quality impact. Since the proposed project would exceed the BAAQMD thresholds of significance for ROG, the project would have a significant cumulative impact on regional air quality.

D. HAZARDOUS MATERIALS

The Initial Study concluded that the proposed project would not have significant adverse hazardous materials impacts (for further information, see Appendix A, pages A-21 to 23). Hazardous materials information (except for lead paint and asbestos hazards) is included in the EIR for informational purposes and to orient the reader.

REGULATORY FRAMEWORK

Federal

Hazardous materials and hazardous wastes are extensively regulated by various federal, state, regional, and local regulations, with the primary objective of protecting public health and the environment. The U.S. Environmental Protection Agency (U.S. EPA) is the lead agency for enforcing federal regulations that affect public health or the environment. The primary federal laws and regulations include the *Resource Conservation and Recovery Act* of 1976 (RCRA) and the *Hazardous and Solid Waste Amendments* enacted in 1984; the *Comprehensive Environmental Response, Compensation and Liability Act* of 1980 (CERCLA); and the *Superfund Act and Reauthorization Act* of 1986 (SARA). Federal regulations pertaining to hazardous materials and wastes are contained in the *Code of Federal Regulations* (CFR), Title 40.

State

California hazardous materials laws incorporate federal standards, but are often stricter than federal laws. The primary state laws include the *California Hazardous Waste Control Law* (HWCL), the state equivalent of RCRA, and the *California Hazardous Substance Account Act*, the state equivalent of CERCLA. State hazardous materials and waste regulations are contained in the *California Code of Regulations* (CCR) Titles 22 and 26. State underground storage tank laws and regulations are contained in the CCR Title 23.

The California Department of Toxic Substances Control (DTSC) enforces hazardous materials and waste regulations in California, in conjunction with the U.S. EPA. The DTSC is responsible for regulating the management of hazardous substances including the remediation of sites contaminated by hazardous substances. The Regional Water Quality Control Board (RWQCB) is authorized by the State Water Resources Control Board to enforce provisions of the *Porter - Cologne Water Quality*

Control Act of 1969. BAAQMD may also impose specific requirements on remediation activities to protect ambient air quality from dust or other airborne contaminants.

Underground Storage Tanks

State laws also regulate underground storage tanks (USTs) containing hazardous substances. These laws are primarily found in the Health and Safety Code, and, combined with CCR Title 23, comprise the requirements of the state UST program. The laws contain requirements for UST permitting, construction, installation, leak detection monitoring, repairs and corrective actions and closures. In accordance with state laws, the San Francisco Department of Public Health implements UST regulations in the City and County of San Francisco.

LOCAL ORDINANCES

Two local ordinances meet or exceed state and federal requirements for site investigations and the storage of hazardous substances. These include San Francisco Municipal Code, Article 21 (the Hazardous Materials Ordinance), and San Francisco Municipal Code, Article 22 (the Hazardous Waste Ordinance). In addition, the Maher Ordinance is a San Francisco Regulation which requires certain environmental actions for various sites but those primarily “Bayward of the high-tide line.” The site is not within the limits of the ordinance.

Hazardous Materials Ordinance

The Hazardous Materials Ordinance provides for safe handling of hazardous materials in the City. Any person or business that handles, sells, stores, or otherwise uses hazardous materials in quantities exceeding specified thresholds and for a period of greater than 30 days is required by Article 21 to register the hazardous materials with the Department of Public Health.

Hazardous Waste Ordinance

The Hazardous Waste Ordinance provides for safe handling of hazardous wastes in the City. The ordinance incorporates the state requirements for hazardous waste described in Section 6.5 (Hazardous Waste Management) of the California Health and Safety Code, as well as the accompanying regulations found in CCR Title 22.

Setting

A Phase I Environmental Site Assessment (ESA) of the project site was conducted by an independent consultant (Stechmann Geoscience, Inc. (SGI), March 20, 2001). The Phase I ESA was conducted to identify possible environmental concerns related to on-site or nearby chemical use, storage, handling, spillage, and/or on-site disposal, with particular focus on potential degradation of soil and groundwater quality. A Phase II investigation was also conducted by SGI in April 2001 to assess petroleum hydrocarbons and heavy metals in the soil. A copy of the Phase I and Phase II ESA is available for review as part of the project file at the Planning Department, 1660 Mission Street.

HISTORIC USES

It is believed that the land was developed as early as 1914. Residences with storage structures, a restaurant, a commercial builders supply warehouse, an old tire storage yard, a possible auto wrecking yard, a commercial business warehouse, and a contractor's yard and business were located on various portions of the site up until around 1975. The Goodman builder supply/lumber warehouse at 445 Bayshore was constructed around 1945 and the other warehouse, last occupied by Whole Earth Access, at 401 Bayshore was constructed around 1965. Sanborn Maps indicate that an old tire storage yard, followed by a possible auto wrecking yard, was at 401 Bayshore sometime between 1947 to 1965, and underground storage tanks (USTs) were present on the site as early as 1950 until February 1999. Contaminated soils associated with those businesses exist on the project site.

SUBSURFACE CONDITIONS

The project site is located in a general area of the City where past industrial land uses and debris fill associated with the 1906 earthquake and bay reclamation often left hazardous waste residues in local soils and groundwater. Based on a geotechnical investigation, including recent and previous exploratory borings and recent test pits, the site is underlain by about 9 to 22 feet of uncompacted and undocumented artificial fills over Bay Mud deposits with the northwest corner of the site underlain by slope debris and ravine fill.¹ The site is located in the Islais Basin, a non-beneficial use

¹ Geotechnical Professionals, Inc. [GPI], October 18, 2001, *Revised Geotechnical Investigation, Proposed Home Depot, Bayshore Boulevard and Waterloo, San Francisco, California*, October 18, 2001. This report is available by appointment for public review in Project File No. 2001.0062E at the Planning Department, 1660 Mission Street, fifth floor, San Francisco.

groundwater basin. Groundwater was found at levels ranging from 9 feet to 14 feet below ground surface.

SOURCES OF HAZARDOUS MATERIALS

Hazardous material means a substance or combination of substances, which because of its quantity, concentration or physical, chemical or infectious characteristics, may pose a substantial present or potential hazard to human health or environment when improperly treated, stored, transported or disposed of or otherwise managed.² The proposed project site contains potential sources of hazardous materials associated with former activities on the site or construction materials used in the existing buildings. These sources could include former or existing underground storage tanks (USTs), soil contamination originating from underlying fill materials, asbestos or other building materials such as lead and PCBs. Lead and asbestos were discussed in the Initial Study (Appendix A). Regulations and procedures by the *San Francisco Building Code* would ensure that potential impacts of demolition due to lead-based paint would be less than significant. Various city and state regulations and procedures, already established as a part of the permit review process for the project, would insure that any potential impacts due to asbestos would be less than significant. Thus, the presence of asbestos and lead paint on the project site would not be considered potentially significant impacts.

- Potentially hazardous levels of total and/or soluble lead have been found in soils as a result of soil testing at other sites in the project area. The DPH Environmental Health-Hazardous Waste Unit (EHS-HWU) considers soils with a total lead concentration of over 750 parts per million (ppm) to be potentially hazardous.

The Phase I investigation examined the history of use on the project site and in the area for potential sources of hazardous substances as a result of activities on and off the site that may have involved handling, storage, or disposal of hazardous substances that would affect the quality of soils or groundwater. The Phase I ESA found several addresses near the project site that were on the local,

² Harte, 1991.

state and federal databases of identified sites of hazardous materials. There are a total of 78 cases with possible releases of chemicals of environmental concerns that were identified within the area of the search (ranging up to a one-mile radius of the project site). Not all 78 cases are considered to have impacted the site because of their distance (approximately one-eighth mile or greater) from the site, and/or their relative location down-gradient/cross-gradient from the site, or that the sites have been identified in the various data bases as requiring no further action (NFA), dropped from the list, or have no listing of violations.

UNDERGROUND STORAGE TANKS

Records indicate that a 550-gallon gasoline underground storage tank (UST) on the project site was removed in May of 1990 under the requirement of San Francisco Department of Public Health, the Local Oversight Program (DPH-LOP) and the Department of Fire Prevention. Two 4,000-gallon USTs were also removed from the site in February of 1999 under the requirements of DPH-LOP and the BAAQMD.

Soil results from the removal of the 550-gallon gasoline UST found total petroleum hydrocarbons as gasoline (TPH-G), benzene, toluene, ethylbenzene and xylenes (BTEX). Soil samples collected from the bottom of the excavation for the two former 4,000-gallon USTs found TPH-G, BTEX, methyl-tert-butyl-ether (MTBE) and total lead (Pb). Groundwater samples associated with the USTs were also taken and revealed TPH-G, BTEX, and MTBE. The DPH-LOP requested a work plan addressing the groundwater contamination, specifically requesting at least one groundwater-monitoring well to be installed within 10 feet of the former excavation of the two 4,000-gallon USTs and quarterly monitoring of the well for a period of one year. According to the DPH-LOP, the monitoring sets of results (for this one-year period) for the groundwater sample from the monitoring well were negative (there were no elevated concentrations of contaminants). A Remedial Action Completion Certification was issued by the DPH-LOP on January 23, 2002, and no further action related to the UST petroleum releases at the was required.³

³ Letter from Rajiv Dhatia MD, DPH-LOP to Shannon Brundieck, January 23, 2002. This letter is available for public review in Project File No. 2001.0062E at the Planning Department, 1660 Mission Street, fifth floor, San Francisco.

IDENTIFIED ON-SITE SOIL CONTAMINATION

Petroleum Hydrocarbons

Gasoline contains over 200 petroleum-derived constituents.⁴ Analysis for gasoline in a soil or groundwater matrix is commonly limited to detection of benzene, toluene, ethylbenzene and xylenes (BTEX). These four constituents, which are readily measurable with conventional analytical methods, can pose a serious threat to human health, have the potential to rapidly move through soil and groundwater and have flammable and explosive vapors.

Presently, there are no regulatory remediation ("cleanup") levels for petroleum hydrocarbons in soils. The local regulatory oversight agency usually determines the soil remediation goals on a case-by-case basis, depending on the particular conditions on the site. Considerations for remediation goals include the type of contaminant, future human health risks, potential for the contaminant to reach groundwater, extent of impacted soil and near-vicinity receptors.

The Phase II soil results detected total petroleum hydrocarbons (TPH) concentrations in shallow soils throughout the site, as well as gasoline-range hydrocarbons (TPHg) in one of the boring samplings. However, the concentrations are not at levels that would warrant additional testing or remediation.

LEAD IN SOILS

- The presence of lead in soils above natural background levels can be a common occurrence in former industrial areas. Depending on the dose, overexposure to lead can result in chronic and acute health effects manifested by seizures, paralysis, convulsions and possibly death.⁵ Possible sources of lead include lead additives in petroleum, lead-based exterior and interior paint, or former metalworking operations. Lead concentrations can also be above natural background levels in artificial fill materials similar to those that underlie the site because these materials can originate from former

⁴ Regional Water Quality Control Board (RWQCB), *Leaking Underground Fuel Tank Field Manual* (LUFT Task Force, 1989).

⁵ Eugene Meyer, *Chemistry of Hazardous Materials*, Second Edition, Brady, Prentice Hall Career and Technology, New Jersey, 1990.

buildings and industrial operations that at one time could have contained sources of lead such as piping and construction materials. The *California Code of Regulations, Title 22*, considers soil with lead to be hazardous waste if it exceeds a total concentration of 750 parts per million (ppm) and a soluble concentration of 5 ppm.⁶ The Phase II investigation revealed elevated levels of lead, however, only three of the 45 samples exceeded the threshold concentration.

Impacts

This section describes potential impacts related to the proposed project and legally required remediation and abatement measures that would be implemented as part of the project to reduce or eliminate potential impacts. Additional mitigation measures identified in this EIR are included in Chapter IV, Mitigation Measures. No significant hazardous materials impacts that cannot be mitigated have been identified.

SIGNIFICANCE CRITERIA

As noted above, hazardous materials are substances with certain chemical or physical properties that may pose a present or future hazard to human health or the environment when improperly handled, stored, disposed or otherwise managed. Hazardous materials impacts would be considered significant for the purposes of this EIR if they were to create a potential public health hazard or involve the use, production or disposal of materials that pose a hazard to people or animal or plant populations in the affected area. Impacts would also be considered significant if the proposed project would interfere with emergency response plans or emergency evacuation plans.

Determination of "substantial" hazard or "significant" levels of hazardous materials is performed on a case-by-case basis, although generally there are regulatory guidelines for determining acceptable levels and/or public health risks associated with exposure to hazardous materials. Definition, identification, and determination of threshold levels of hazardous materials are provided in the *Code of Federal Regulations* Title 40 and in the *Code of California Regulations* (CCR) Titles 22 and 26.

⁶ Analysis of the soluble concentration of lead is performed to assess the soil's ability to "leach" lead into the underlying groundwater.

IMPACT ANALYSIS

The Phase II investigation revealed elevated levels of total petroleum hydrocarbons, lead and chromium in the soil. Elevated concentrations of total barium, chromium, nickel, and zinc were found in artificial fill soil on the site. Elevated concentrations of soluble chromium, lead, nickel, and zinc were also detected in several samples submitted for the Waste Extraction Test analysis. The Phase II recommended that a Site Mitigation Plan and a Soil Management Plan be prepared to safely remediate the site.

A Sampling Plan and the Site Mitigation Plan (SMP) was prepared by William Dubovsky Environmental (WDE) in April 2001, and reviewed by the EHS-HWU. In response to a number of concerns raised by EHS-HWU, an Amended Site Mitigation Plan was prepared by SGI in July 2001. Copies of the reports and EHS-HWU's comments are available for public review as part of the project file at the Planning Department, 1660 Mission Street.

The Amended SMP contained the results of 24 additional shallow soil borings as proposed by the Sampling Plan, 12 of which were beneath the existing buildings. Soil samples were taken at the depths of one to two feet deep, except for those within the proposed elevator pits, which were taken at the depth of six feet. The Amended SMP noted that the levels of metals and TPH were found to be consistent with levels previously found in other areas of the site in the Phase II studies. Elevated levels of chromium, however, were found in the cross pattern of one of the boring samples (2,360 mg/kg which exceeds the industrial Preliminary Remediation Goal of 450 mg/kg set by the U.S. EPA). The Amended SMP estimated that approximately of 235 cubic yards of chromium-impacted soil may be disturbed during grading activities.

The SMP proposed that throughout the entire span of soil compaction and site development, the work area would be wetted down at least three times daily to reduce potential dust. Air monitoring would be conducted during the work. Should off-site disposal be necessary, all soils would be stockpiled on an impermeable surface and covered with visqueen pending characterization.

In a letter dated August 9, 2001, EHS-HWU requested that the area where elevated chromium concentrations were found be removed from the site and not be included as part of the fill material.

A plan to mitigate the contamination would be prepared by the project sponsor and submitted to EHS-HWU for review.

The mitigation measures listed on pages 106 through 110 would ensure that the hazardous materials on the project site would be removed and treated in accordance with regulatory guidelines and that there would be no potential significant hazardous materials impacts associated with the proposed project.

Construction Dewatering

Although the construction techniques used in building the project foundation and below grade parking garage would prevent off-site groundwater from seeping into the site, the excavation of the soil would entail dewatering and discharging the water. Due to the presence of contaminated soils, there may be localized areas of groundwater contamination on the site. Contaminants could include petroleum hydrocarbons and lead. As noted in the Initial Study on page A-20, dewatered groundwater would be discharged to the City's combined storm and sanitary sewer system in accordance with the City's Industrial Waste Ordinance Number 199-77 (*Public Works Code*, Article 4.1) or to the Bay pursuant to an approval discharge permit. If standards could not be met with on-site treatment, off-site disposal by a certified waste-hauling contractor would be required. The project sponsor and the San Francisco Department of Public Health would identify the appropriate handling procedures for groundwater produced during dewatering. These measures would minimize public health exposure to hazardous materials present in the dewatering discharge and reduce potential impacts to a less-than-significant level.

E. CULTURAL RESOURCES

An archeological cultural resources evaluation of the project site was completed by an independent consultant and is summarized here.¹ In its natural state, the project site was situated on relatively level ground at elevations ranging between 0 and 10 feet above mean sea level. Based on a review of

¹ After the Initial Study was published, an archival cultural resources report was prepared for the project site by an archeologist, Allen G. Pastron, PhD., *Archival Cultural Resources Evaluation of the Proposed 491 Bayshore Boulevard/196 Loomis Street, Home Depot Project, San Francisco, California*, May 2002.

III. ENVIRONMENTAL SETTING AND IMPACTS

CULTURAL RESOURCES

various historical maps, the project site and its immediate locale were situated amidst the salt marshes surrounding Islais Creek on the interface of the wet and dry environmental zones.

Although no prehistoric/protohistoric resources are known to exist on the project site, numerous archeological sites have been recorded in the Islais Creek region. The project site is generally situated in what was, prior to the arrival of the first Europeans, the northwestern portion of the territory occupied by the Costanoan people, a Native American group also referred to in anthropological literature as the Ohlone. The natural setting of the project site was a generally favorable environmental setting for the encampments of aboriginal hunters and gatherers.

As far as can be determined from historical records, the area surrounding and including the project site remained in a completely natural state throughout the Spanish/Mexican era. Consequently, there is very little, if any, likelihood of encountering significant or potentially significant subsurface cultural deposits from the Spanish/Mexican era within the confines of the proposed project site.

Historical records indicate that the project site remained in a completely natural state throughout the Early American and Gold Rush eras. The 1869 U.S. Coast and Geodetic Survey Map of San Francisco shows the project site to be completely undeveloped. By contrast, San Francisco's downtown area at this same period was a bustling metropolis. At the turn of the century, a portion of Islais Creek still ran through the project site. The 1914 Sanborn Insurance Company Maps of San Francisco show that the rivulet of Islais Creek had been filled in, San Bruno Avenue runs along the current Bayshore Boulevard bordering the western portion of the project site, and a railroad track is to the east of the project site. A line of five, small-to-medium-sized sheds appear on the project site near intersection of Cortland Avenue and San Bruno Avenue.

The marshy tract that characterized much of the Islais Creek neighborhood was finally transformed into buildable land by the first half of the 20th Century. It was not until the 1950s that any appreciable number of industries and businesses had begun to occupy the reclaimed land. During this period the James Lick Freeway (I-280) was added to the industrial landscape of the region and continues to dominate and in many ways define the neighborhood.

The cultural resources evaluation concluded that given the multiplicity of documented, prehistoric deposits in the project area, the project site should be deemed a zone of high prehistoric/protohistoric archeological sensitivity. Accordingly, a systematic program of pre-construction archeological testing and evaluation is recommended. With implementation of the Cultural Resources Mitigation Measure, the project's potential impact on subsurface cultural resources would be reduced to a level of insignificance.

F. GROWTH INDUCEMENT

- In general, a project would be considered growth-inducing if its implementation would result in substantial population increases and/or new development that might not occur if the project were not approved and implemented. The proposed project would replace two existing buildings, formerly used for a home improvement and building supply store and a retail home furnishing and supply store totaling approximately 107,400 sq.ft., with an approximately 153,089 sq.-ft. home improvement store and a 539-space parking garage. This would intensify the use of the site, but would not be expected to substantially alter development patterns in the northwest Bayview Hunters Point area or elsewhere in San Francisco. The project site is in an urbanized area that is intensively developed and already supports substantial amounts of light industrial, warehouse, commercial, and residential development in surrounding blocks.
- The addition of the home improvement store and parking garage would increase the daily population on the project site by approximately 2,500 to 3,300 people. This daily population would consist of approximately 175 to 197 employees and as many as 2,500 to 3,000 shoppers per day. It is anticipated that most of the new employees would already reside in San Francisco, while some employees from outside the City may seek housing within the City boundaries.

The number of on-site employees relocating from outside San Francisco would be small in proportion to San Francisco's overall population, and would not represent a substantial growth in population or concentration in the neighborhood, City, or region.

The proposed project is located in an urban area and would not necessitate or induce the extension of municipal infrastructure. The project may induce commercial growth in the area, but such growth

III. ENVIRONMENTAL SETTING AND IMPACTS

GROWTH INDUCEMENT

would be part of the planned growth for the City. Therefore, the proposed project would not have a significant effect on growth inducement.

IV. MITIGATION MEASURES PROPOSED TO MINIMIZE THE POTENTIAL ADVERSE IMPACTS OF THE PROJECT

Pursuant to CEQA, for each significant impact identified in the EIR, the EIR must discuss feasible measures to avoid or substantially reduce the project's significant effects. Some of the mitigation measures discussed in this EIR that would avoid or reduce significant environmental effects have been adopted by the project sponsor and, therefore, are proposed as part of the project. Some measures would require implementation by public agencies. Section A, below, contains those mitigation measures identified in this EIR as necessary to mitigate significant environmental effects. Mitigation measures would reduce but not eliminate the impacts of the proposed project on transportation and air quality. There are no feasible mitigation measures for the potentially significant impacts on regional emissions of reactive organic gases and for the 2015 adverse cumulative conditions on the five ramps on U.S 101 and I-280 Freeways. Mitigation measures identified in this EIR would be required by the Planning Commission as conditions of project approval unless they are demonstrated to be infeasible based on substantial evidence in the record.

Measures discussed below are divided into two categories: (1) measures that would avoid potentially significant impacts; and (2) measures proposed to improve project effects that would not be considered significant impacts. Several items are required by law that would serve to mitigate impacts. These include a limitation on construction noise (*San Francisco Noise Ordinance*, Article 29 of the *San Francisco Police Code*, 1972); a prohibition on the use of mirrored glass on the building (City Planning Commission Resolution No. 9212); and protective measures against lead-based paint exposure (Chapter 36 of the San Francisco Building Code, Work Practices for Exterior Lead-Based Paint). The project sponsor and construction contractors would also be required to observe all state and federal OSHA safety requirements related to handling and disposal of other hazardous materials, such as asbestos.

The mitigation measures identified in this EIR follow.

A. MITIGATION MEASURES

MEASURES THAT WOULD BE IMPLEMENTED BY PUBLIC AGENCIES

Transportation

- In the year 2015, the cumulative conditions at the Mission Street/Cortland Avenue intersection would operate at LOS F during both the weekday PM peak hour and Saturday midday peak hour. The poor operating conditions would be due to the increase in overall traffic volumes at the intersection, making it difficult for vehicles to turn left from southbound Mission Street to Cortland Avenue. The project's contribution to this adverse condition would be significant, however, operations of this left turn movement could be improved by creating a left-turn phase (left-turns would be permitted during the northbound/southbound phase, but would have their own protected left-turn phase as well). With this mitigation measure, the intersection would operate at LOS C during the weekday PM peak hour and LOS D during the Saturday midday peak hour. The project sponsor would pay for the costs of this measure.

MEASURES PROPOSED AS PART OF THE PROJECT

Construction Air Quality

The project sponsor shall require the construction contractor(s) to spray the project site with water during excavation, grading, and site preparation activities; spray unpaved construction areas with water at least twice per day; cover stockpiles of soil, sand, and other such material; cover trucks hauling debris, soils, sand or other such material; and sweep surrounding streets during these periods at least once per day to reduce particulate emissions. Ordinance 175-91, passed by the Board of Supervisors on May 6, 1991, requires that non-potable water be used for dust control activities. Therefore, the project sponsor shall require the construction contractor(s) to obtain reclaimed water from the Clean Water Program for this purpose.

The project sponsor shall require the project contractor(s) to maintain and operate construction equipment so as to minimize exhaust emissions of particulates and other pollutants, by such means as prohibiting idling motors when equipment is not in use or when trucks are waiting in queues, and implementing specific maintenance programs to reduce emissions for equipment that would be in frequent use for much of the construction period.

In addition to the standard mitigation procedures above, the following additional measures shall be implemented due to proximity of a sensitive receptor (the Montessori School on Loomis and Industrial Streets):

- Contractors will suspend dust-producing activities when winds (instantaneous gusts) exceed 25 mph.
- The project sponsor will require the construction contractor to designate a dust-control coordinator who will respond to dust complaints. This person's name and phone will be posted prominently on the project site and provided to the Big City Montessori School.

This person shall respond to complaints within 24-hours or less and have the authority to take corrective action.

- Watering will be used to control dust generation during demolition of structures and break-up of pavement.
- Dust-proof chutes to load debris into trucks will be used whenever feasible.

Hazards

The project sponsor shall follow the mitigation measures delineated and described in the William Dubovsky Environmental Site Mitigation Plan, SGI's Amended Site Mitigation Plan, and comply with DPH's letters dated June 11, 2001 and August 9, 2001 and any further guidelines and revisions set by the DPH, including implementation of the Health and Safety Plan (HSP). The project sponsor must take the following actions prior to approval and issuance by the San Francisco Planning Department of the building permit application for construction of the new buildings on the project site.

Based on the results of the Phase II Environmental Site Assessment (ESA) soil tests, Environmental Health Management Section-Hazardous Waste Unit (EHS-HWU) determined the soils on the project site are contaminated with lead, petroleum hydrocarbons, total chromium, or other materials associated with previous businesses on the site. The project sponsor shall submit a detailed Project Construction/Excavation Plan and a revised Site Mitigation Plan (SMP) to EHS-HWU at 1390 Market Street, Suite 822, San Francisco, California 94102 for review and approval.

Preparation of Revised Site Mitigation Plan

The revised SMP shall include a discussion of the level of contamination of soils on the project site by petroleum hydrocarbons, lead, total chromium or other hazardous materials and mitigation measures for managing contaminated soils on the site, including, but not limited to: 1) the removal of the contaminated soils; and 2) the specific practices to be used to handle, haul, and dispose of contaminated soils on the site, including, but not limited to, the measures listed below.

Preparation of a Revised Health and Safety Plan

The project sponsor shall submit a revised Health and Safety Plan (HSP), prepared in accordance with State of California Occupational Safety and Health Administration Guidelines, to the San Francisco Department of Public Health, Environmental Health Management Section- Hazardous Waste Unit (EHS-HWU) at 1390 Market Street, Suite 822, San Francisco, California 94102 for review, approval, and implementation. The HSP shall be prepared by a Health and Safety Officer certified by the State of California. The HSP shall contain an analysis of potential hazards on the project site, including exposure petroleum hydrocarbons, or other hazardous materials associated with gas and oil facility, that may be encountered by workers on the project site; and precautions to mitigate the potential hazards. As noted in the Amended SMP submitted by the project sponsor to EHS-HWU, an HSP shall be submitted at least two weeks prior to commencement of any redevelopment site work.

Handling, Hauling, and Disposal of Contaminated Soils

- (a) specific work practices: If the project sponsor assumes that the soils on the project site are contaminated with lead, total chromium, petroleum hydrocarbons, or other hazardous materials associated with gas and oil facility at or above potentially hazardous levels; or if, based on the results of the soil tests conducted, DPH determines that the soils on the project site are contaminated with lead, total chromium, petroleum hydrocarbons, or other hazardous materials at or above potentially hazardous levels, the construction contractor shall be alert for the presence of such soils during excavation and other construction activities on the site (detected through soil odor, color, and texture and results of on-site soil testing), and shall be prepared to handle, profile (i.e., characterize), and dispose of such soils appropriately (i.e., as dictated by local, state, and federal regulations, including Cal-OSHA safe work practices) when such soils are encountered on the site.
- (b) dust suppression: The construction contractor shall keep soils exposed during excavation for site preparation and project construction moist throughout the time they are exposed, both during and after work hours.
- (c) surface water runoff control: Where soils are stockpiled, the construction contractor shall use visqueen to create an impermeable liner, both beneath and on top of the soils, with a berm to contain any potential surface water runoff from the soil stockpiles during inclement weather.
- (d) soils replacement: If necessary, the construction contractor shall use clean fill or other suitable material(s) to bring portions of the project site, where contaminated soils have been excavated and removed, up to construction grade.
- (e) hauling and disposal: The construction contractor shall haul contaminated soils off the project site by waste hauling trucks appropriately certified with the State of California and adequately covered to prevent dispersion of the soils during transit, and shall dispose of contaminated soils at a permitted hazardous waste disposal facility registered with the State of California or other appropriate agency.

Preparation of Closure/Certification Report

After excavation and foundation construction activities are completed, the project sponsor shall prepare and submit a closure/certification report to the San Francisco Department of Public Health, Environmental Health Management Section-Hazardous Waste Unit (EHS-HWU) for review and approval at 1390 Market Street, Suite 822, San Francisco, California 94102. The closure/certification report shall include the mitigation measures in the SMP for handling and removing contaminated soils from the project site, whether the construction contractor modified any of these mitigation measures, and how and why the construction contractor modified those mitigation measures.

Deed Recordation on Remaining Contaminated Soils

If potentially hazardous levels of petroleum hydrocarbons, lead, total chromium or other hazardous materials associated with gas and oil facility remain in soils on the project site

after project construction and if both of the following circumstances are met, the project sponsor shall file a recordation on the deed for the subject property that indicates the need to take special precautions during future disturbance of the soils on the property due to certain on-site soil conditions:

- (a) The project sponsor assumes that the soils on the project site are contaminated with lead, total chromium or petroleum hydrocarbons at or above potentially hazardous levels; *OR* based on the results of the soil tests conducted, DPH determines that the soils on the project site are contaminated with lead, total chromium or petroleum hydrocarbons at or above potentially hazardous levels; *and*
- (b) Potentially hazardous levels of lead, total chromium or petroleum hydrocarbons remain in soils on the project site.

● Cultural Resources

Based on a reasonable presumption that archeological resources may be present within the project site, the following measures shall be undertaken to avoid any potentially significant adverse effect from the proposed project on buried or submerged historical resources. The project sponsor shall retain the services of a qualified archeological consultant having expertise in California prehistoric and urban historical archeology. The archeological consultant shall undertake an archeological testing program as specified herein. In addition, the consultant shall be available to conduct an archeological monitoring and/or data recovery program if required pursuant to this measure. The archeological consultant's work shall be conducted in accordance with this measure at the direction of the Environmental Review Officer (ERO). All plans and reports prepared by the consultant as specified herein shall be submitted first and directly to the ERO for review and comment, and shall be considered draft reports subject to revision until final approval by the ERO. Archeological monitoring and/or data recovery programs required by this measure could suspend construction of the project for up to a maximum of four weeks. At the direction of the ERO, the suspension of construction can be extended beyond four weeks only if such a suspension is the only feasible means to reduce to a less-than-significant level potential effects on a significant archeological resource as defined in CEQA *Guidelines* Section 15064.5 (a)(c).

Archeological Testing Program The archeological consultant shall prepare and submit to the ERO for review and approval an archeological testing plan (ATP). The archeological testing program shall be conducted in accordance with the approved ATP. The ATP shall identify the property types of the expected archeological resource(s) that potentially could be adversely affected by the proposed project, the testing method to be used, and the locations recommended for testing. The purpose of the archeological testing program will be to determine to the extent possible the presence or absence of archeological resources and to identify and to evaluate whether any archeological resource encountered on the site constitutes an historical resource under CEQA.

At the completion of the archeological testing program, the archeological consultant shall submit a written report of the findings to the ERO. If based on the archeological testing program the archeological consultant finds that significant archeological resources may be

IV. MITIGATION MEASURES

present, the ERO in consultation with the archeological consultant shall determine if additional measures are warranted. Additional measures that may be undertaken include additional archeological testing, archeological monitoring, and/or an archeological data recovery program. If the ERO determines that a significant archeological resource is present and that the resource could be adversely affected by the proposed project, at the discretion of the project sponsor either:

- A) The proposed project shall be re-designed so as to avoid any adverse effect on the significant archeological resource; or
- B) A data recovery program shall be implemented, unless the ERO determines that the archeological resource is of greater interpretive than research significance and that interpretive use of the resource is feasible.

Archeological Monitoring Program. If the ERO in consultation with the archeological consultant determines that an archeological monitoring program shall be implemented the archeological monitoring program shall minimally include the following provisions:

- The archeological consultant, project sponsor, and ERO shall meet and consult on the scope of the AMP reasonably prior to any project-related soils disturbing activities commencing. The ERO in consultation with the archeological consultant shall determine what project activities shall be archeologically monitored. In most cases, any soils-disturbing activities, such as demolition, foundation removal, excavation, grading, utilities installation, foundation work, driving of piles (foundation, shoring, etc.), site remediation, etc., shall require archeological monitoring because of the risk these activities pose to potential archeological resources and to their depositional context;
- The archeological consultant shall advise all project contractors to be on the alert for evidence of the presence of the expected resource(s), of how to identify the evidence of the expected resource(s), and of the appropriate protocol in the event of apparent discovery of an archeological resource;
- The archeological monitor(s) shall be present on the project site according to a schedule agreed upon by the archeological consultant and the ERO until the ERO has, in consultation with project archeological consultant, determined that project construction activities could have no effects on significant archeological deposits;
- The archeological monitor shall record and be authorized to collect soil samples and artifactual/ecofactual material as warranted for analysis;
- If an intact archeological deposit were encountered, all soils-disturbing activities in the vicinity of the deposit shall cease. The archeological monitor shall be empowered to temporarily redirect demolition/excavation/pile driving/construction activities and equipment until the deposit is evaluated. If in the case of pile driving activity (foundation, shoring, etc.), the archeological monitor has cause to believe that the pile driving activity may affect an archeological resource, the pile driving activity shall be terminated until an appropriate evaluation of the resource has been made in consultation with the ERO. The archeological consultant shall immediately notify the ERO of the

encountered archeological deposit. The archeological consultant shall make a reasonable effort to assess the identity, integrity, and significance of the encountered archeological deposit, and present the findings of this assessment to the ERO. Whether or not significant archeological resources are encountered, the archeological consultant shall submit a written report of the findings of the monitoring program to the ERO.

Archeological Data Recovery Program. The archeological data recovery program shall be conducted in accord with an archeological data recovery plan (ADRP). The archeological consultant, project sponsor, and ERO shall meet and consult on the scope of the ADRP prior to preparation of a draft ADRP. The archeological consultant shall submit a draft ADRP to the ERO. The ADRP shall identify how the proposed data recovery program will preserve the significant information the archeological resource is expected to contain. That is, the ADRP will identify what scientific/historical research questions are applicable to the expected resource, what data classes the resource is expected to possess, and how the expected data classes would address the applicable research questions. Data recovery, in general, should be limited to the portions of the historical property that could be adversely affected by the proposed project. Destructive data recovery methods shall not be applied to portions of the archeological resources if nondestructive methods are practical.

The scope of the ADRP shall include the following elements:

- *Field Methods and Procedures.* Descriptions of proposed field strategies, procedures, and operations.
- *Cataloguing and Laboratory Analysis.* Description of selected cataloguing system and artifact analysis procedures.
- *Discard and Deaccession Policy.* Description of and rationale for field and post-field discard and deaccession policies.
- *Interpretive Program.* Consideration of an on-site/off-site public interpretive program during the course of the archeological data recovery program.
- *Security Measures.* Recommended security measures to protect the archeological resource from vandalism, looting, and nonintentionally damaging activities.
- *Final Report.* Description of proposed report format and distribution of results.
- *Curation.* Description of the procedures and recommendations for the curation of any recovered data having potential research value, identification of appropriate curation facilities, and a summary of the accession policies of the curation facilities.

Human Remains and Associated or Unassociated Funerary Objects. The treatment of human remains and of associated or unassociated funerary objects discovered during any soils disturbing activity shall comply with applicable State and Federal laws. This shall include immediate notification of the Coroner of the City and County of San Francisco and in the

event of the Coroner's determination that the human remains are Native American remains, notification of the California State Native American Heritage Commission (NAHC), which shall appoint a Most Likely Descendant (MLD) (Public Resource Code Section 5097.98). The archeological consultant, project sponsor, and MLD shall make all reasonable efforts to develop an agreement for the treatment of, with appropriate dignity, human remains and associated or unassociated funerary objects (CEQA *Guidelines*, Section 15064.5(d)). The agreement should take into consideration the appropriate excavation, removal, recordation, analysis, custodianship, curation, and final disposition of the human remains and associated or unassociated funerary objects.

Final Archeological Resources Report. The archeological consultant shall submit a Draft Final Archeological Resources Report (FARR) to the ERO that evaluates the historical significance of any discovered archeological resource and describes the archeological and historical research methods employed in the archeological testing/monitoring/data recovery program(s) undertaken. Information that may put at risk any archeological resource shall be provided in a separate removable insert within the final report.

Once approved by the ERO, copies of the FARR shall be distributed as follows: California Archeological Site Survey Northwest Information Center (NWIC) shall receive one (1) copy and the ERO shall receive a copy of the transmittal of the FARR to the NWIC. The Major Environmental Analysis division of the Planning Department shall receive three copies of the FARR along with copies of any formal site recordation forms (CA DPR 523 series) and/or documentation for nomination to the National Register of Historic Places/California Register of Historical Resources. In instances of high public interest in or the high interpretive value of the resource, the ERO may require a different final report content, format, and distribution than that presented above.

B. IMPROVEMENT MEASURES

- Improvement measures diminish effects of the project that were found through the environmental analysis to be less-than-significant impacts. The following measure would be implemented by the Department of Parking and Traffic and the cost would be borne by the project sponsor.

Transportation

- In 2015, the cumulative conditions at the Bayshore Boulevard and Silver Avenue intersection would operate at LOS D during the weekday PM peak hour, although the northbound left-turn movement would operate at LOS F, the resulting queue would extend past the left-turn pocket. The proposed project would not significantly contribute to the cumulative conditions. To improve operations, a protected northbound left-turn phase could be established (under the existing signalization plan for the intersection, the northbound and southbound left-turns are permitted, not protected), and the cycle length could be increased from 75 seconds to 90 seconds. These improvements would be appropriate independent of the project under existing conditions and would be designed to mitigate cumulative significant impacts to which the project would not make a significant contribution. The overall intersection operating conditions during the weekday PM peak hour would remain at

LOS D, but the northbound left-turn operations would improve and the average delay per vehicle would decrease. Assuming the protected left-turn phase would be established at other times, the intersection would operate at LOS C during the Saturday midday peak hour.

V. SIGNIFICANT ENVIRONMENTAL EFFECTS WHICH CANNOT BE AVOIDED IF THE PROJECT IS IMPLEMENTED

In accordance with Section 21100(b)(2)(A) of the California Environmental Quality Act (CEQA), and with Section 15126.2 of the State CEQA Guidelines, the purpose of this chapter is to identify environmental impacts that could not be eliminated or reduced to an insignificant level by mitigation measures included as part of the proposed project, or by other mitigation measures that could be implemented, as described in Chapter IV, Mitigation Measures, pages 105 through 111. This chapter is subject to final determination by the City Planning Commission as part of its certification of the EIR. The Final EIR has been revised, as necessary, to reflect the findings of the Commission.

The proposed project, with mitigation, would have the following unavoidable significant impacts in the area of air quality and traffic:

- The proposed project would exceed the BAAQMD threshold of significance for regional emissions of reactive organic gases (ROG). This is an unmitigable project level and cumulative impact.
- The proposed project would have a significant unmitigable contribution to the 2015 adverse cumulative conditions on the U.S. 101 Freeway northbound on-ramp at Alemany Boulevard/Industrial Street; the southbound U.S. 101 Freeway on-ramp at Alemany Boulevard/Industrial Street; the U.S. 101 Freeway northbound on-ramp at Bayshore Boulevard/Cesar Chavez Street; the U.S. 101 Freeway southbound on-ramp at San Bruno Avenue; and I-280 Freeway westbound on-ramp at Alemany Boulevard.

With implementation of the mitigation measures outlined in Chapter IV, Mitigation Measures, of this report, all other potential significant impacts would be reduced to a less-than-significant level.

V. SIGNIFICANT ENVIRONMENTAL EFFECTS

The project sponsor has agreed to implement all measures in Chapter IV (except for those requiring public agency responsibility) in an agreement dated March 25, 2003.¹

¹ This mitigation agreement is available by appointment for public review at the San Francisco Planning Department, 1600 Mission Street, fifth floor, in Case File No. 2001.0062E.

VI. ALTERNATIVES TO THE PROPOSED PROJECT

This chapter identifies alternatives to the proposed project and discusses environmental impacts associated with each alternative. Project decision-makers could adopt any of the following alternatives instead of the proposed project, if an alternative would reduce or eliminate significant environmental impacts of the proposed project and is determined to be feasible and would attain most of the basic objectives of the project. This determination of feasibility will be made by project decision-makers on the basis of substantial evidence in the record which shall include, but not be limited to, information presented in this EIR and in comments received on the Draft EIR.

Alternatives were selected that would reduce identified impacts of the proposed project. The following alternatives are evaluated: a No-Project Alternative, a Variant No-Project Alternative, a 60,000-Square-Foot Alternative, a 107,400-Square-Foot Reduced Density Alternative, and a 140,000-Square-Foot Alternative. The Variant No-Project Alternative would consist of the two existing buildings on site reused as permitted by zoning with no discretionary approvals. The 60,000-Square-Foot Alternative would consist of a home improvement store with a maximum size of 60,000 sq.ft. The 107,400-Square-Foot Reduced Density Alternative would be the proposed home improvement store approximately seventy percent the size of the proposed project. The 140,000-Square-Foot Alternative would be the proposed home improvement store approximately ninety-one percent the size of the proposed project. Other alternatives, with a variety of building configurations, could also be considered by decision-makers as such other alternatives would be “bracketed” by the range of alternatives described herein. Other uses, including mixed-uses, for the project site are not considered as the project sponsor only intends to build and operate a home improvement store, and other uses would not meet the basic objectives of the project.

Whether property is owned or can reasonably be acquired by the project sponsor has a strong bearing on the feasibility of developing a project alternative at a different site. No viable alternative sites have been identified within San Francisco where the proposed project could be constructed and meet

the project sponsor's objectives, including locations along Third Street and near Candlestick Park. In addition, the project sponsor does not own or control any other site in the City.

ALTERNATIVE A: NO PROJECT

Description

This alternative would entail no change to the existing site, which is vacant. The proposed project would not be built. This alternative reflects existing physical conditions on the site that are already described in the Project Description and Land Use Setting discussions on pages 25, 26 and 35 to 40. This alternative, however, would not preclude future proposals for redevelopment of the project site.

Impacts

- If Alternative A were implemented, none of the impacts associated with the proposed project would occur. The project site would remain vacant and appear as it does in Figures 8 and 9, pages 38 and 39. The effects of the proposed 153,089 sq.-ft. project and the 539-space parking garage would not occur, nor would there be air quality impacts from the proposed project which exceed the BAAQMD threshold of significance for regional emissions of reactive organic gases (ROG). There would be no project-specific transportation effects, including the contribution to the 2015 cumulative traffic conditions on the northbound U.S. 101 Freeway on-ramp at Alemany Boulevard/Industrial Street; the northbound U.S. 101 Freeway on-ramp at Bayshore Boulevard/Cesar Chavez Street, the southbound U.S. 101 Freeway on-ramp at San Bruno Avenue, and the westbound I-280 Freeway on-ramp at Alemany Boulevard. The hazardous materials in the soil would remain on the project site. Other less-than-significant effects described in the Initial Study, including generation of noise during construction, and potential disturbance of archeological resources, among other impacts, would not occur with this alternative.

Alternative A would not meet any of the project sponsor's objectives (as stated on page 25), including the development of a standard size Home Depot home improvement store for San Francisco.

If this alternative were selected by the San Francisco Planning Commission and a different proposal is submitted at a later date for development of all or part of the project site, that proposal would be subject to a separate project-specific environmental review under the requirements of CEQA.

ALTERNATIVE B: VARIANT NO PROJECT

Description

- This alternative represents one possibility of what could be expected if the proposed project were not approved. The two existing buildings on site would be reused for retail/commercial uses as permitted by zoning with no discretionary approvals. The former Goodman Lumber Company building is about 76,846 sq.ft., and the previous Whole Earth Access supply store is approximately 30,500 sq.ft., for a total of approximately 107,400 sq.ft. In this alternative, the retail/commercial uses would presumably be one or two large-scale enterprises similar to the previous uses on the site and/or proposed uses for the site. It is assumed that the buildings would comply with building codes and the *San Francisco Planning Code* requirement for the provision of off-street parking (which would equate to 347 spaces).

Impacts

- Compared to the proposed project, Alternative B would have less intensive environmental effects on transportation and parking, population, shadows, construction noise, air quality, utilities and public services, and energy/natural resources because of its smaller size. Alternative B would generate approximately 6,316 weekday daily vehicle-trips and 552 PM peak hour vehicle-trips, and approximately 8,222 Saturday daily vehicle-trips and 789 midday peak hour vehicle-trips (about a 35 percent reduction from the proposed project).¹ The operating conditions would be better than with the project, and the levels of congestion at the key intersections studied would be less than with the proposed project. Tables 11 and 12 on pages 118 and 119 show a comparison of the transportation LOS effects of each alternative. The LOS at the Bayshore/Jerrold/US 101 intersection, for example, would remain at LOS C (rather than LOS D with the proposed project) during the weekday PM peak hour. The intersection of Mission Street/Cortland Avenue would still need to have a signal upgrade to accommodate the growth in traffic volumes along Mission Street in 2015. The traffic improvement measures that are part of the proposed project would not occur with this alternative. These measures include traffic signals and pedestrian crosswalks to be installed at Bayshore Boulevard and Cortland Avenue, a left-turn pocket to be created for southbound Bayshore Boulevard traffic to enter

¹ Based on an estimate of 13.5 person trips per 1,000 sq.ft. of retail for Weekday PM peak hour, and 19.3 person trips per 1,000 sq.ft. of retail space for Saturday midday per the San Francisco Planning Department, *Interim Transportation Impacts Analysis Guidelines for Environmental Review*, January 2000.

Table 11
Comparison of Alternatives – Intersection Levels of Service

WEEKDAY PM PEAK HOUR Intersection	Existing		Existing + Project		Existing + Alt B		Existing + Alt C		Existing + Alt D		Existing + Alt E	
	Delay	LOS	Delay	LOS	Delay	LOS	Delay	LOS	Delay	LOS	Delay	LOS
Bayshore/Oakdale	22.5	C	29.7	D	26.7	D	24.7	C	26.9	D	28.9	D
Bayshore/Cortland ¹	11.4	B	27.4	D	25.1	D	24.8	C	25.2	D	25.6	D
Bayshore/Industrial	25.9	D	33.0	D	29.8	D	28.3	D	30.2	D	32.1	D
Bayshore/Silver	16.5	C	20.1	C	18.0	C	17.4	C	18.0	C	19.2	C
Bayshore/Jerrold/US101	24.1	C	25.1	D	24.6	C	24.5	C	24.6	C	24.9	C
Oakdale/Loomis ²	16.1	C	16.6	C	16.4	C	16.3	C	16.5	C	16.6	C
Industrial/Loomis ³	6.7	B	8.6	B	7.9	B	7.4	B	7.9	B	8.4	B
Industrial/Cut-Thru	5.0	B	5.2	B	5.1	B	5.1	B	5.1	B	5.2	B
Alemamy/Putnam/US101 ⁴	15.2	C	15.5	C	15.4	C	15.3	C	14.4	C	15.4	C
Alemamy/US101/San Bruno	14.7	B	17.9	C	16.5	C	15.6	C	16.6	C	17.6	C
Alemamy/Cut-Thru/US101	4.7	A	4.9	A	4.9	A	4.8	A	4.9	A	4.9	A
Cortland/Folsom ⁵	7.0	B	7.9	B	7.4	B	7.3	B	7.6	B	7.8	B
Cortland/Andover ⁵	8.4	C	10.2	C	9.2	B	8.8	B	9.6	B	10.0	C
Mission/Cortland ⁶	14.5	B	22.4	C	18.9	C	16.6	C	19.1	C	21.9	C

SATURDAY MIDDAY PEAK HOUR Intersection	Existing		Existing + Project		Existing + Alt B		Existing + Alt C		Existing + Alt D		Existing + Alt E	
	Delay	LOS	Delay	LOS	Delay	LOS	Delay	LOS	Delay	LOS	Delay	LOS
Bayshore/Oakdale	15.6	C	18.0	C	16.7	C	16.2	C	16.9	C	17.6	C
Bayshore/Cortland ¹	9.8	B	34.6	D	31.1	D	30.0	D	31.6	D	33.6	D
Bayshore/Industrial	20.0	C	21.9	C	20.8	C	20.5	C	21.0	C	21.6	C
Bayshore/Silver	12.1	B	12.5	B	12.3	B	12.2	B	12.3	B	12.4	B
Bayshore/Jerrold/US101	29.1	D	30.6	D	29.8	D	29.5	D	29.9	D	30.4	D
Oakdale/Loomis ²	8.6	B	8.7	C	8.6	B	8.6	B	8.7	B	8.8	B
Industrial/Loomis ³	4.5	A	5.6	B	5.1	B	4.9	A	5.2	B	5.4	B
Industrial/Cut-Thru	4.5	A	4.4	A	4.5	A	4.5	A	4.5	A	4.5	A
Alemamy/Putnam/US101 ⁴	24.1	C	33.2	D	28.1	D	25.6	D	29.1	D	32.0	D
Alemamy/US101/San Bruno	13.0	B	16.1	C	14.4	B	13.6	B	14.7	B	15.6	C
Alemamy/Cut-Thru/US101	3.4	A	4.1	A	3.7	A	3.8	A	4.0	A	4.1	A
Cortland/Folsom ⁵	6.4	B	8.3	B	7.6	B	7.0	B	7.7	B	8.1	B
Cortland/Andover ⁵	8.9	B	9.7	B	9.5	B	9.2	B	9.4	B	9.6	B
Mission/Cortland ⁶	16.5	C	32.4	D	18.9	C	21.9	D	26.3	D	31.4	D

Source: Wilbur Smith Associates – March 2003

Notes:¹ Assumes reconfiguration and resignalization of Bayshore/Cortland intersection (as required for Project).⁴ Includes changes to signal timing to accommodate future traffic volumes.² Unsignalized intersection -- delay and LOS presented for northbound approach.⁵ Unsignalized intersection -- delay and LOS presented for worst approach.³ Unsignalized intersection -- delay and LOS presented for southbound approach.⁶ Mission/Cortland improved by establishing permitted/protected phasing for SB left turns.

Table 12
Comparison of Alternatives – Intersection Levels of Service, 2015 Cumulative Conditions

WEEKDAY PM PEAK HOUR Intersection	Existing		2015 with Project		2015 with Alt B		2015 with Alt C		2015 with Alt D		2015 with Alt E	
	Delay	LOS	Delay	LOS	Delay	LOS	Delay	LOS	Delay	LOS	Delay	LOS
Bayshore/Oakdale	22.5	C	33.9	D	33.7	D	33.8	D	33.6	D	33.7	D
Bayshore/Cortland ¹	11.4	B	36.0	D	35.2	D	35.1	D	35.3	D	35.7	D
Bayshore/Industrial	25.9	D	37.5	D	35.6	D	32.9	D	36.1	D	36.3	D
Bayshore/Silver	16.5	C	38.7	D	34.0	D	34.0	D	36.2	D	38.7	D
Bayshore/Jerrold/US101	24.1	C	34.4	D	34.4	D	34.4	D	34.4	D	34.4	D
Oakdale/Loomis ²	16.1	C	26.7	D	27.1	D	26.2	D	27.1	D	26.7	D
Industrial/Loomis ³	6.7	B	14.0	C	12.4	C	10.6	C	12.5	C	13.9	C
Industrial/Cut-Thru	5.0	B	5.7	B	5.7	B	5.7	B	5.7	B	5.7	B
Aleman/Putnam/US101 ⁴	15.2	C	16.8	C	16.8	C	16.7	C	16.8	C	16.8	C
Aleman/US101/San Bruno	14.7	B	26.1	D	23.0	D	21.1	D	23.7	D	24.1	D
Aleman/Cut-Thru/US101	4.7	A	5.3	B	5.1	B	5.0	B	5.1	B	5.2	B
Cortland/Folsom ⁵	7.0	B	9.8	B	9.0	B	8.2	B	9.1	B	9.7	B
Cortland/Andover ⁵	8.4	C	16.5	C	14.5	C	11.2	C	14.8	C	15.4	C
Mission/Cortland ⁶	14.5	B	>60	F	>60	F	>60	F	>60	F	>60	F

SATURDAY MIDDAY PEAK HOUR Intersection	Existing		2015 with Project		2015 with Alt B		2015 with Alt C		2015 with Alt D		2015 with Alt E	
	Delay	LOS	Delay	LOS	Delay	LOS	Delay	LOS	Delay	LOS	Delay	LOS
Bayshore/Oakdale	15.6	C	22.6	C	20.4	C	20.7	C	20.3	C	21.6	C
Bayshore/Cortland ¹	9.8	B	39.7	D	35.9	D	34.6	D	36.4	D	38.4	D
Bayshore/Industrial	20.0	C	24.4	C	23.4	C	22.6	C	24.0	C	24.1	C
Bayshore/Silver	12.1	B	12.4	B	12.1	B	12.0	B	12.2	B	12.3	B
Bayshore/Jerrold/US101	29.1	D	35.0	D	33.0	D	33.0	D	33.0	D	34.2	D
Oakdale/Loomis ²	8.6	B	11.4	C	11.0	C	10.6	C	10.8	C	11.4	C
Industrial/Loomis ³	4.5	A	7.6	B	6.2	B	5.8	B	6.2	B	6.7	B
Industrial/Cut-Thru	4.5	A	4.8	A	4.7	A	4.7	A	4.7	A	4.8	A
Aleman/Putnam/US101 ⁴	24.1	C	25.5	D	21.3	C	21.3	C	21.5	C	24.3	C
Aleman/US101/San Bruno	13.0	B	29.7	D	19.0	C	17.2	D	20.1	C	26.2	C
Aleman/Cut-Thru/US101	3.4	A	4.7	A	4.1	A	3.8	A	4.2	A	4.6	A
Cortland/Folsom ⁵	6.4	B	9.8	B	8.6	B	7.4	B	9.0	B	9.6	B
Cortland/Andover ⁵	8.9	B	23.1	D	18.7	C	12.1	C	20.9	D	21.7	D
Mission/Cortland ⁶	16.5	C	>60	F	>60	F	>60	F	>60	F	>60	F

Source: Wilbur Smith Associates – March 2003

Notes:¹ Assumes reconfiguration and resignalization of Bayshore/Cortland intersection (as required for Project).⁴ Includes changes to signal timing to accommodate future traffic volumes.² Unsignalized intersection -- delay and LOS presented for northbound approach.⁵ Unsignalized intersection -- delay and LOS presented for worst approach.³ Unsignalized intersection -- delay and LOS presented for southbound approach.⁶ Mission/Cortland improved by establishing permitted/protected phasing for SB left turns.

the project site, and just north of the project site, the median on Bayshore Boulevard to be modified to allow northbound traffic to make U-turns.

The impacts of both the proposed project and this alternative on transit, parking, pedestrians, bicycles, construction traffic, and contribution to total cumulative traffic volumes would be less-than-significant. This alternative would make a smaller contribution to the growth in cumulative traffic impacts at nearby intersections than would the proposed project, however, it would also have a significant contribution (more than five percent increase) to the 2015 cumulative conditions on the northbound U.S. 101 Freeway on-ramp at Alemany Boulevard/Industrial Street; the southbound U.S. 101 Freeway on-ramp at Alemany Boulevard/Industrial Street; the northbound U.S. 101 Freeway on-ramp at Bayshore Boulevard/Cesar Chavez Street, the southbound U.S. 101 Freeway on-ramp at San Bruno Avenue, and the westbound I-280 Freeway on-ramp at Alemany Boulevard.

In those environmental areas not governed by height or bulk, this alternative would have effects similar to the proposed project on land use, operation noise, biology, geology/topography, water, and any potential hazardous materials would remain on site. It is assumed that this alternative would have minimal effect on archeological cultural resources as there would be no excavation. In Alternative B, the current buildings would be reused and there would be little change in the existing visual character of the site.

Alternative B would not have a significant impact on air quality, unlike the proposed project. The effect on regional air quality would be under the BAAQMD threshold for significance. This alternative, however, would cause increased emissions of reactive organic gases, nitrogen oxides, particulates and carbon monoxide in the region, though these increases would be approximately thirty percent of what is generated by the proposed project. The increases would be less than significant relative to total regional emissions of these pollutants.

Alternative B would generate a smaller increase in employment and daily population than the proposed project. The population effects of both this alternative and the proposed project would be less than significant.

Alternative B would not meet most of the project sponsor's objectives of developing a standard size Home Depot home improvement store for San Francisco.

ALTERNATIVE C: 60,000-SQUARE-FOOT PROJECT

This alternative is included in response to comments made on the Initial Study that requested an analysis of a home improvement store smaller than the previous 76,846 sq.-ft. Goodman's Lumber store.

Description

The existing buildings on the site would be demolished, and a one-story approximately 60,000 sq.-ft. home improvement store would be constructed with an adjacent surface parking lot containing approximately 350 parking spaces. The store would include housewares, a home decorating center, lumber and garden plants. The parking lot would be accessible from Bayshore Boulevard, Waterloo Street and Loomis Street. The main entrance to the store would be from the parking lot, and loading docks would be accessible on Loomis Street. This alternative would occupy the entire site, which would preclude the opportunity for further development at the same level of density on the site unless a parking structure were later constructed.

Impacts

Compared to the proposed project, Alternative C would have less intensive environmental effects on visual quality and urban design, transportation and parking, shadows, construction noise, utilities and public services, and energy/natural resources because of its smaller size. In those environmental areas not governed by height or bulk, this alternative would have similar effects as the proposed project on land use, operation noise, biology, geology/topography, water, hazards, and cultural resources.

This alternative would generate a smaller increase in employment and daily population than the proposed project. The population effects of both this alternative and the proposed project would be less-than-significant.

The visual impacts of this alternative, during both day- and nighttime, would be correspondingly reduced as the parking would be on a surface lot and the building would be approximately twenty to thirty feet in height. The parking lot, however, would not be enclosed and would be visible from the street as well as from portions of the Bernal Heights neighborhood.

Alternative C would not have a significant impact on air quality, unlike the proposed project. This alternative, however, would cause increased emissions of reactive organic gases, nitrogen oxides, particulates and carbon monoxide in the region, though these increases would be approximately thirty percent of what is generated by the project. The increases would be less than significant relative to total regional emissions of these pollutants, and would be below the BAAQMD's thresholds of significance.

- A 60,000 sq.-ft. project would result in fewer vehicle and transit trips than the proposed project. Alternative C would generate approximately 4,059 weekday daily vehicle-trips and 332 PM peak hour vehicle-trips, and approximately 4,202 Saturday daily vehicle-trips and 497 midday peak-hour vehicle trips (an approximately 60 percent reduction from the proposed project). The operating conditions would improve compared to the project and the levels of congestion at the key intersections studied would be less than that of the proposed project. The LOS at three intersections: Bayshore/Jerrold/US 101, Bayshore/Oakdale and Bayshore/Cortland, would remain at LOS C with this alternative (rather than LOS D with the proposed project) during the weekday PM peak hour. The intersection of Mission Street/Cortland Avenue would still require a signal upgrade to accommodate the growth in traffic volumes along Mission Street.

The impacts of this alternative on transit, parking, pedestrians, bicycles, construction traffic, and contribution to total cumulative traffic volumes would be less-than-significant, except for the contribution to the 2015 cumulative conditions (more than five percent increase) on the northbound U.S. 101 Freeway on-ramp at Alemany Boulevard/Industrial Street, the southbound U.S. 101 Freeway on-ramp at Alemany Boulevard/Industrial Street, the southbound U.S. 101 Freeway on-ramp at San Bruno Avenue, and the westbound I-280 Freeway on-ramp at Alemany Boulevard, all of which would be significant impacts. The contribution of Alternative C to the northbound U.S. 101 Freeway on-ramp at Bayshore Boulevard/Cesar Chavez Street would be less-than-significant. This alternative would make a smaller contribution to the growth in cumulative traffic impacts at nearby intersections than would the proposed project.

CEQA requires that the EIR identify an environmentally superior alternative in addition to the No Project Alternative. This alternative would have fewer impacts than the proposed project and the

other alternatives discussed above, and would therefore, be considered the environmentally superior alternative.

This alternative would not meet the project sponsor's objectives of developing a standard size Home Depot home improvement store for San Francisco, offering a full range of home improvement items and services. Although there are a few locations in the United States (Brooklyn, Staten Island, and Chicago) where Home Depot has experimented with developing home improvement stores of this size, these stores do not carry the full range of home improvement services and are located within a close proximity to full-size Home Depot stores, relying on those stores for support services. The Home Depot store in Colma is not close enough to rely on for support services.

ALTERNATIVE D: 107,400-SQUARE-FOOT PROJECT

Description

This alternative would be a Home Depot store similar to the proposed project in terms of building exterior and parking garage, however, there would be no mezzanine and the total square footage would be approximately 107,400 sq.ft., about 45,690 sq.ft. less than the proposed project (a reduction of approximately thirty percent). There would be a ground floor area about the same size as the proposed project (approximately 96,250 sq.ft.), no second level/mezzanine sales area, a smaller greenhouse (about 5,604 sq.ft. compared to 9,888 sq.ft. for the proposed project), and a smaller garden center (about 5,550 sq.ft. compared to 8,546 sq.ft.). The parking garage would have about 385 parking spaces on two levels (about 165 spaces fewer than the proposed project). The exterior building in Alternative D would be similar to the proposed project.

Impacts

- Most of the potential impacts identified for the proposed project would occur with Alternative D, but at a lower level. This alternative would still demolish the two existing vacant buildings and replace them with a new retail building, garden center, greenhouse and parking garage. Thus, the change in land use would be the same, but the size and resultant population density of this alternative would be approximately one-third less than the proposed project. The estimated on-site population would be about 122 to 138 employees and between 2,300 to 2,600 shoppers per day, and would increase the concentration of people on the project site.

- The reduced employee population and fewer shoppers would translate to fewer vehicle trips, both daily and PM peak-hour trips, reduced transit demand, and reduced parking demand. Alternative D would generate approximately 7,266 weekday daily vehicle-trips and 595 PM peak hour vehicle-trips, and about 7,521 Saturday daily vehicle-trips and 890 midday peak hour vehicle-trips (about a 30 percent reduction from the proposed project).² This reduction in vehicle-trips could result in a reduction in vehicle delays at the local intersections as compared to the project. The operating conditions would be better than with the project, and the levels of congestion at the key intersections studied would be less than with the proposed project. The LOS at the Bayshore/Jerrold/US 101 intersection, for example, would remain at LOS C (rather than LOS D with the proposed project) during the weekday PM peak hour. The intersection of Mission Street/Cortland Avenue would still require a signal upgrade to accommodate the growth in traffic volumes along Mission Street.

Neither the project nor this alternative would result in project-specific significant impacts on traffic flow, however, both would have a significant unmitigable contribution to the 2015 cumulative conditions (more than five percent increase) on the northbound U.S. 101 Freeway on-ramp at Alemany Boulevard/Industrial Street; the southbound U.S. 101 Freeway on-ramp at Alemany Boulevard/Industrial Street; the northbound U.S. 101 Freeway on-ramp at Bayshore Boulevard/Cesar Chavez Street, the southbound U.S. 101 Freeway on-ramp at San Bruno Avenue, and the westbound I-280 Freeway on-ramp at Alemany Boulevard.

It is assumed that the same traffic improvement measures as the proposed project would be included with this alternative: traffic signals and pedestrian crosswalks would be installed at Bayshore Boulevard and Cortland Avenue, a left-turn pocket would be created for southbound Bayshore Boulevard traffic to enter the project site, and just north of the project site, the median on Bayshore Boulevard would be modified to allow northbound traffic to make U-turns.

Alternative D would not have a significant impact on air quality, unlike the proposed project. This alternative, however, would cause increased emissions of reactive organic gases, nitrogen oxides,

² Based on the weekday PM peak hour trip rate of 5.54 vehicle trips per 1,000 sq.ft., and Saturday midday peak hour trip rate of 8.28 vehicle-trips per 1,000 sq.ft. Trip rate data is from surveys conducted at four Home Depot stores in California.

particulates and carbon monoxide in the region, though these increases would be approximately seventy percent of what is generated by the project. The increases would be less than significant relative to total regional emissions of these pollutants, and would be below the BAAQMD's thresholds of significance.

The public services demand and energy consumption under this alternative would be roughly seventy percent that of the proposed project. Operational noise would be about the same as the proposed project. Alternative D's effects related to geology, hydrology, hazardous materials, and potential subsurface cultural resources, however, would be comparable to those of the proposed project. The height of the parking garage would be one level lower and the visual effects would be slightly less than the proposed project. Construction impacts of this alternative would be similar to those of the proposed project, though somewhat reduced in duration.

This alternative would meet the project sponsor's basic objectives of constructing a standard-sized Home Depot home improvement store within the City and County of San Francisco, although it would not be at the level the project sponsor would prefer to offer Home Depot's complete range of home improvement services and products, including a garden center of approximately 8,500 sq.ft., an enclosed greenhouse of approximately 10,000 sq.ft., and a full service lumber department.

ALTERNATIVE E: 140,000-SQUARE-FOOT PROJECT

Description

This alternative would also be a Home Depot store similar to the proposed project in terms of building exterior and parking garage. The total square footage would be approximately 140,000 sq.ft., about 13,000 sq.ft. less than the proposed project (a reduction of approximately eight and a half percent). There would be a ground floor area about the same size as the proposed project (approximately 96,250 sq.ft.), a smaller second level/mezzanine sales area (approximately 32,000 sq.ft. compared to 38,405 sq.ft. for the proposed project), a smaller greenhouse (about 7,000 sq.ft. compared to 9,888 sq.ft. for the proposed project), and a smaller garden center (about 4,839 sq.ft. compared to 8,546 sq.ft.). The parking garage would have about 500 parking spaces on two levels plus rooftop (about 50 spaces fewer than the proposed project). The exterior building in Alternative E would be similar to the proposed project.

Impacts

- Alternative E is the maximum size project that would avoid potentially significant air quality impacts of emissions of reactive organic gases. Most of the other potential impacts identified for the proposed project would occur with Alternative D, but at a slightly lower level. This alternative would still demolish the two existing vacant buildings and replace them with a new retail building, garden center, greenhouse and parking garage. Thus, the change in land use would be the same, but the size and resultant population density of this alternative would be approximately eight and a half percent less than the proposed project. The estimated daily on-site population would be about 149 to 180 employees and between 2,400 to 2,700 shoppers per day, and would increase the concentration of people on the project site.
- Alternative E would generate approximately 9,480 weekday daily vehicle-trips and 776 PM peak hour vehicle-trips, and approximately 9,796 Saturday daily vehicle-trips and 1,159 midday peak hour vehicle-trips (about a 10 percent reduction from the proposed project). This small reduction in vehicle-trips could result in a equivalent reduction in vehicle delays at the local intersections as compared to the project. The operating conditions would be about the same as the project, and the levels of congestion at the key intersections studied would be similar to the proposed project. The exception in LOS would be at the Bayshore/Jerrold/US 101 intersection, which would remain at LOS C (rather than LOS D with the proposed project) during the weekday PM peak hour. The intersection of Mission Street/Cortland Avenue would still require a signal upgrade to accommodate the growth in traffic volumes along Mission Street.

Neither the project nor this alternative would result in project-specific significant impacts on traffic flow, however, both would have a significant unmitigable contribution to the 2015 cumulative conditions (more than five percent increase) on the northbound U.S. 101 Freeway on-ramp at Alemany Boulevard/Industrial Street; the southbound U.S. 101 Freeway on-ramp at Alemany Boulevard/Industrial Street; the northbound U.S. 101 Freeway on-ramp at Bayshore Boulevard/Cesar Chavez Street, the southbound U.S. 101 Freeway on-ramp at San Bruno Avenue, and the westbound I-280 Freeway on-ramp at Alemany Boulevard.

It is assumed that the same traffic improvement measures as the proposed project would be included with this alternative: traffic signals and pedestrian crosswalks would be installed at Bayshore

Boulevard and Cortland Avenue, a left-turn pocket would be created for southbound Bayshore Boulevard traffic to enter the project site, the northbound Bayshore left-turn pocket would be lengthened, and just north of the project site, the median on Bayshore Boulevard would be modified to allow northbound traffic to make U-Turns.

Alternative E would cause increased emissions of nitrogen oxides, particulates and carbon monoxide in the region, though these increases would be approximately eight and a half percent less than that generated by the proposed project. The increases would be less than significant relative to total regional emissions of these pollutants, and would be below the BAAQMD's thresholds of significance.

The public services demand and energy consumption under this alternative would be roughly 91.5 percent than that of the proposed project. Operational noise would be about the same as the proposed project. Alternative E's effects related to visual quality, geology, hydrology, hazardous materials, and potential subsurface cultural resources, however, would be comparable to those of the proposed project. Construction impacts of this alternative would also be similar to those of the proposed project.

This alternative would meet the project sponsor's basic objectives of constructing a standard-sized Home Depot home improvement store within the City and County of San Francisco, although it would not be at the level the project sponsor would prefer to offer Home Depot's complete range of home improvement services and products, including a garden center of approximately 8,500 sq.ft., an enclosed greenhouse of approximately 10,000 sq.ft., and a full service lumber department.

VII. COMMENTS AND RESPONSES

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A. INTRODUCTION

This chapter contains summaries of the public comments received on the Draft Environmental Impact Report (EIR) prepared for the proposed 491 Bayshore Boulevard/196 Loomis Street project, and responses to those comments.

All substantive comments made at the Draft EIR public hearing before the Planning Commission on July 10, 2003, and received during the Draft EIR public review period from March 29, 2003, to July 11, 2003, are presented herein by direct quotation, edited to delete repetition and nonsubstantive material only. Minor edits may have been made to the public hearing transcript for clarification. Editorial changes to the comments are indicated by square brackets.

Comments and responses are grouped by subject matter and are arranged by topic corresponding to the Table of Contents in the Draft EIR. Each group of comments is followed by its set of responses; the order of the responses under each topic follows the order of the comments. As the subject matter of one topic may overlap that of other topics, the reader must occasionally refer to more than one group of comments and responses to review all information on a given subject. Where this occurs, cross-references are provided. The order of the comments from a particular letter may vary from that of the original. All comment letters and the transcript of the public hearing on the 491 Bayshore Boulevard Home Depot project are presented in their entirety in Appendices E and F, respectively.

It should be noted that the Comments and Responses component of the environmental review process is intended to respond to comments on the adequacy of the approach and analysis in a Draft EIR. Comments regarding the merits of and concerns about the project should be directed to the Planning Commission to assist with its decision of whether or not to approve the project, a decision that will be made at a public hearing subsequent to certification (determination of completeness) of the Final EIR. In order to approve the project, the Planning Commission would be required to adopt a Statement of Overriding Considerations, as required by the California Environmental Quality Act (CEQA), to explain the greater public good that would be achieved despite the significant unavoidable impacts that would occur as identified in the EIR. Some comments do not pertain to physical environmental issues, but, in some instances, responses are included to provide additional information for use by decision-makers.

These comments and responses have been incorporated into this Final EIR as a new chapter. Text changes resulting from comments and responses also have been incorporated into the EIR, as indicated in the responses and in Section E of this chapter, Staff-Initiated Text Changes and Errata. Additions to text in the EIR are shown in **bold**, deletions are shown in ~~striketrough~~, except where the text is indicated as entirely new, in which case no bold is used for easier reading.

B. PREFERRED PLAN

Subsequent to the publication of the DEIR on March 29, 2003, the project sponsor identified a new garage access plan that would relocate the currently proposed parking garage to the northern section of the project site. This new access plan, called Option F, would have 16 more parking spaces than the proposed garage already presented in the DEIR (555 compared to 539). A description of Option F, which is the sponsor's preferred plan, and an assessment of its environmental impacts are presented in this section.

Designation of Option B does not require recirculation of the DEIR. CEQA requires the recirculation of a DEIR after the close of the public review period, prior to certification of the Final EIR, if “significant new information” is added to the DEIR. The CEQA Guidelines Section 15088.5 notes, as examples of “significant new information,” a new project alternative, which is considerably different from others previously analyzed, that clearly would lessen the environmental impacts for the project but that the project’s proponents decline to adopt; the disclosure of a new significant environmental impact from the project or from new mitigation measures; or a substantial increase in the severity of an environmental impact that is not mitigated to a level of insignificance. A comparison of the assessment of Option F, described below, to the assessment of the original project garage as analyzed in the DEIR, demonstrates that the impacts associated with Option F would be similar to the impacts associated with the original project. The project proponents would be willing to adopt Option F, as indicated by its designation as the project sponsor’s preferred plan. In addition, Option F would have no new significant impacts not identified in the DEIR, and all mitigation measures identified in the DEIR, the Initial Study, and this Comments and Responses chapter would remain the same. The public has been afforded the opportunity to review and comment on this new preferred plan as part of this document at the Planning Commission hearing on the certification of the EIR. For the reasons stated above, the designation of Option F as the preferred plan does not meet the standard of “significant new information” as defined by CEQA.

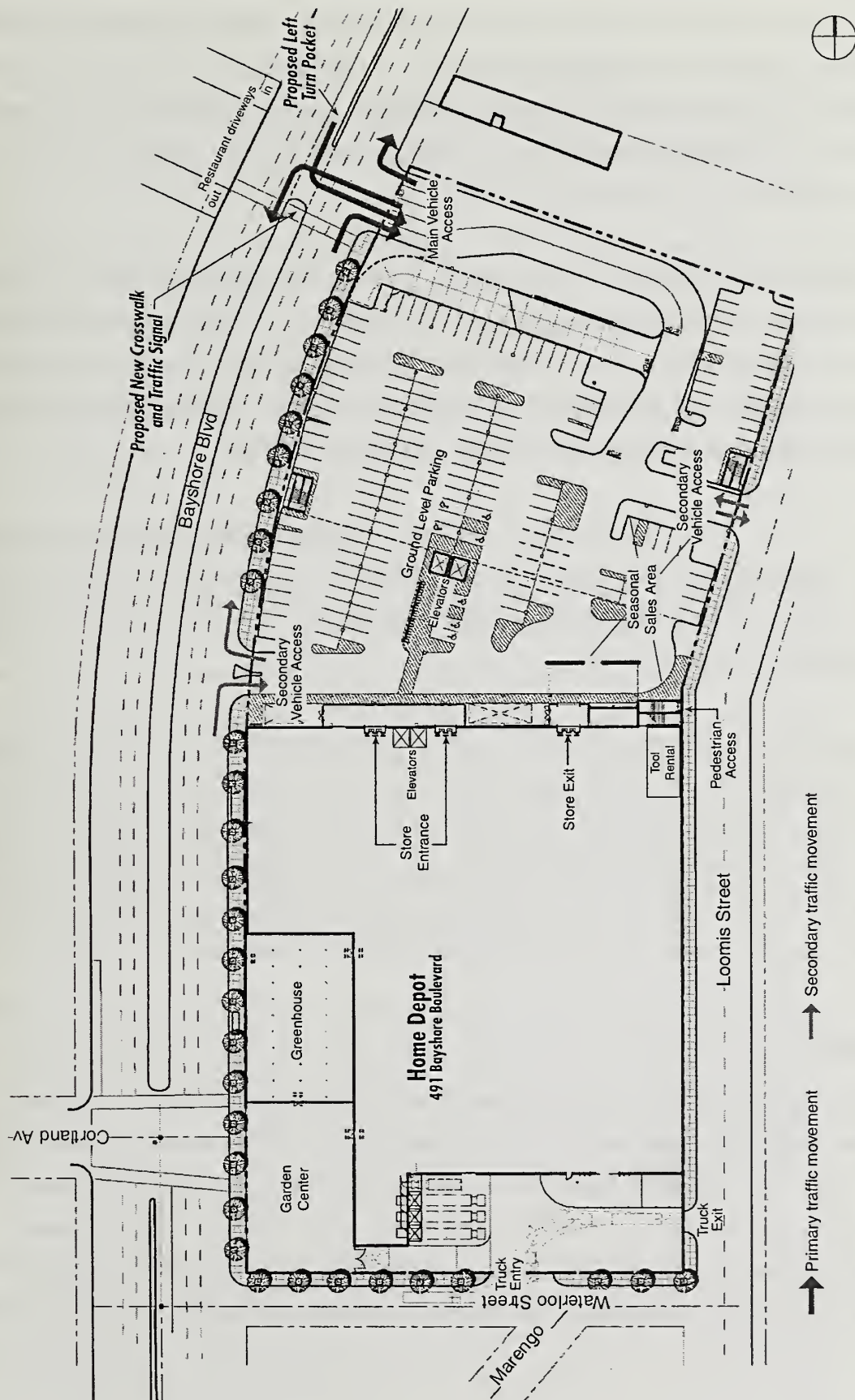
Description

The parking garage would be relocated to the northern section of the project site (similar to configuration with the old Goodman's Lumber) (Figure C&R 1, page C&R.5). Primary vehicular access for customers/employees would be located on the east side of Bayshore Boulevard (approximately 700 feet north of Cortland Avenue) and on Loomis Street. Left-turns from

southbound Bayshore Boulevard to the main Bayshore Boulevard driveway, and left-turns from the Bayshore Boulevard driveway to southbound Bayshore Boulevard would be permitted. Secondary access would also be provided on Bayshore Boulevard (right-turn in and right-turn out only) and on Loomis Street. Option F would require the establishment of a new southbound left-turn pocket within the Bayshore Boulevard median for access to the Bayshore Boulevard driveway and a new traffic signal at the new intersection created for Home Depot access. In addition, a new crosswalk would be established at the south side of the intersection with a pedestrian-activated signal walk phase. The new traffic signal, improved cross walk and lengthening of the northbound left turn pocket at Bayshore Boulevard/Cortland Avenue originally proposed for the project analyzed in the DEIR would not be part of the Option F plan.

The Option F plan would still be a two-story building that would contain approximately 95,582 sq.ft on the main floor (compared to the approximately 96,250 sq.ft. for the original project discussed in the DEIR). There would be approximately 37,670 sq.ft. on the second floor (compared to approximately 38,405 sq.ft. for the original project), and an approximately 9,949 sq.-ft. outdoor garden center (compared to 8,546 sq.ft. for the original project) plus a 9,888 sq.-ft., enclosed greenhouse (same size as the original project). The total square footage of the store and the height would be approximately the same as the project analyzed in the DEIR, 153,089 sq.ft.

Option F would contain 555 parking spaces compared to 539 in the proposed project. There would be approximately 182 spaces on the ground level, 119 spaces on the second level and 254 spaces on the third level, which would be about 16 spaces more than with the proposed project analyzed in the DEIR. The parking garage would be approximately 247,800 sq.ft, and the total Option F plan garage and store would be 400,889 sq.ft. (compared to the 235,597 sq.-ft. proposed project garage and 388,686 sq.-ft. total project discussed in the DEIR).



PREFERRED SITE PLAN—OPTION F FIGURE C&R 1

Source: Greenberg Farrow Architecture
6/27/05

The main entrance to the store would be on the north side of the building on the ground level. There would be another entrance on the garage's second level, which accesses the mezzanine area of the store. Customers would access the proposed store through the garage, primarily for convenience as well as security. The garden center and the greenhouse would be at the southwest corner of the project site with access only from the main store.

There would be separate pedestrian access points to the store on Bayshore Boulevard and Loomis Street at the south end of the garage adjacent to the proposed store. Pedestrians would access the walkway, at the north end of the store, and enter the store through the same entrance as all customers. Due to a grade difference of approximately four to six feet from the first level of the store down to Loomis Street, there would be stairs connecting to the pedestrian walkway.

In common with the proposed project, there would be a "seasonal sales area" in the ground floor parking area that would occupy approximately 26 parking spaces for a duration of about one week four to six times a year, except during December when the area would be used for the sale of Christmas trees for about three weeks.

The loading facilities would be relocated to the southern end of the project site. With this location, delivery vehicles would enter the loading area from Waterloo Street and exit to Loomis Street (as compared to entering from Loomis Street and exiting to northbound Bayshore Boulevard with the proposed project). Delivery vehicles entering the loading area would access Waterloo Street from northbound Bayshore Boulevard, whereas vehicles exiting the loading area would turn left onto northbound Loomis Street to access Oakdale Avenue and Bayshore Boulevard.

Impacts

The Initial Study prepared for the original proposed project determined that impacts in the following areas would be less-than-significant: population, visual quality and urban design, housing, glare, shadow, wind, noise, utilities/public services, biology, geology/topography, water, and energy/natural resources. The Initial Study found that impacts that relate to land use, transportation, air quality, hazardous materials, archeological resources, and growth inducement have been determined to be potentially significant. The impacts of Option F are discussed below.

Land Use, Zoning, and Plan Consistency

The proposed project with the Option F plan would have similar land use characteristics as the proposed project. The project site is within an M-1 (Light Industrial) Zoning District and a 65-J Height and Bulk District. The project with the Option F plan would be a permitted use.

The proposed project as well as the Option F plan would be a large development containing some of the previous uses on the site, and would increase the density of uses, number of customers and amount of vehicles on the site. Similar to the proposed project, the Option F plan would not essentially change the existing retail/light industrial character or physical arrangement of the area. The use would be generally compatible with the mix of surrounding commercial and industrial uses in a dense urban area. The land use impact of the Option F plan would be less-than-significant.

Visual Quality and Urban Design

The proposed project with the Option F plan would have similar impacts on visual quality and urban design as the proposed project analyzed in the DEIR. There would still be two separate structures (store and garage) that are attached, and the visual change on the street level would be similar. The view of the project looking east on Cortland Avenue (Figure C&R.5, on page C&R.24) would be different than the original project as the view would be of the store and would not show the garage entrance since it would be moved to the north. However, the view change would not be significant. The view of the garage would be more noticeable from some residences on Bernal Heights that have views to the southeast. The height of the rooftop parking level would be about the same or lower than the adjacent freeways, which are at a higher elevation.

Option F would also contain rooftop trellis that would be angled inward towards the parking garage, and would be designed to provide screening for the Bernal Heights residents. There would be a four-foot-high solid wall around the perimeter of the rooftop parking level to prevent vehicle car headlights from shining directly into any residences. In common with the original proposal, there would be rooftop landscaping including trees in planter boxes to provide further screening.

The impacts of visual quality and urban design, and views of Option F would be similar to the proposed project in the DEIR and would not be significant.

Transportation

In general, the transportation impacts of the Option F plan would be similar to the impacts of the proposed project analyzed in the DEIR. The location of the primary access point for the project to the north of Cortland Avenue would not substantially affect the volume of traffic that would use Cortland Avenue. Cortland Avenue is one of the few east/west streets in the area, with Cesar Chavez Street to the north of Bernal Heights and Alemany Boulevard, Crescent Avenue, and Silver Avenue to the south of Bernal Heights. As a result, Cortland Avenue would be the most direct route for vehicles traveling to and from the project site from specific locations in San Francisco, such as Bernal Heights, and would also provide connections to the nearby Glen Park, Diamond Heights, Balboa Park and outer Noe Valley neighborhoods. For access between the project site and the rest of San Francisco, other routes would be more direct and convenient. However, since the Option F main driveway would be located further north on Bayshore Boulevard than with the proposed project, and vehicles would be required to turn from Cortland Avenue instead of driving straight into and out of the parking garage, it is likely that with Option F there may be a minor shift in traffic volumes to Cesar Chavez Street or Alemany Boulevard.

With the Option F plan, a new southbound left-turn would be established from Bayshore Boulevard to the north end of the project site, and would require the installation of a new traffic signal on Bayshore Boulevard and crosswalk with a pedestrian-activated crossing signal phase to allow for safe pedestrian access to the Jack-in-the-Box restaurant on the west side of Bayshore Boulevard.

At the location where the proposed left-turn pocket would be located, the center median on Bayshore Boulevard is currently a fixed solid median (left-turns are not possible). The establishment of the left-turn pocket would not restrict access to any business establishments on the east side of the street. However, on the west side of the street, there are driveways for a Jack-in-the-Box restaurant that would be restricted to right-turn in only and right-turn out (to and from southbound Bayshore Boulevard). Vehicles destined to and from the Jack-in-the Box from northbound Bayshore Boulevard would need to make U-turns within the center left-turn median north of the restaurant and the proposed project.

Option F would provide two driveways on Bayshore Boulevard: a right-turn in/right-turn out driveway for northbound traffic at the southern end of the garage, and a full driveway (with all

movements allowed) at the northern end of the garage. The southern driveway would be designed so that vehicles would not be able to turn left to or from southbound Bayshore Boulevard. The northern driveway would have over 250 feet of storage space between Bayshore Boulevard and the garage up/down ramp, which would be sufficient storage space to accommodate queues that would form at the entrance and exit. It is anticipated that Option F would have a minimal affect to traffic and transit operations on Bayshore Boulevard similar to the proposed project.

The transportation study in the DEIR performed for the proposed project reviewed conditions at five freeway on-ramps and fourteen key intersections (signalized and stop-sign controlled) in the vicinity of the project site. A supplemental transportation assessment was prepared for the Option F plan and is discussed in Response #74, pages C&R.149 to C&R.182.

In common with the proposed project, the addition of the vehicle-trips generated by the proposed project with the Option F plan would not change the operating conditions at the study locations for either the weekday PM peak hour or the Saturday midday peak hour analyses. All analysis freeway on-ramps would continue to operate at the same levels of service as under existing conditions.

Although the overall levels of service would remain similar to existing conditions, the increase in vehicles destined to and from the project site with the Option F plan would result in a moderate increase in delay at individual movements at several study intersections (similar to the proposed project analyzed in the DEIR). Vehicles making these movements may experience somewhat higher delays than vehicles at the intersection as a whole, but these impacts would not be enough to constitute significant impacts. The increase in delay at these individual movements would not result in the intersection operating at unacceptable service levels. In addition, the proposed project with the Option F plan would also result in increases in traffic volumes at several movements at the study intersections. The increased volume would not increase the average delay per vehicle at the individual movements or the intersections as a whole. There would be improved conditions at the intersection of Bayshore/Cortland (Level of Service (LOS) B as compared to LOS D with the proposed project analyzed in the DEIR).

Overall, all study intersections and freeway on-ramps under Option F would operate similar to or better than the proposed project conditions analyzed in the DEIR. Option F would not result in any new traffic impacts. By the year 2015, cumulative traffic, however, would result in an increase in

congestion on U.S. 101, I-280 and the nearby on-ramps. The increase in cumulative traffic would cause all five study on-ramp locations to operate at LOS F during the weekday PM peak hour and two of the on-ramp locations to operate at LOS F during the Saturday midday peak hour. The new vehicle-trips generated by Option F would be the same as the project analyzed in the DEIR. The contribution to the poor on-ramp conditions would be considered a significant unavoidable cumulative impact.

For the cumulative traffic conditions in the year 2015, the weekday PM peak hour and the Saturday midday peak hour study intersections in the DEIR would all operate acceptably (LOS D or better), except the intersection of Mission/Cortland, which would operate at LOS F. In common with the proposed project analyzed in the DEIR, Option F's contribution to this adverse condition would be significant. However, operations of this left turn movement could be improved by creating a left-turn only phase in the traffic signal plan (left-turns would still be permitted during the northbound/southbound phase). With this mitigation measure, the intersection would operate at LOS C during the weekday PM peak hour and LOS D during the Saturday midday peak hour.

Parking: Under Option F, parking conditions would be similar as those described for the proposed project in the DEIR. With 555 parking spaces, the Option F plan would provide sufficient spaces to accommodate the maximum weekday and weekend parking demand (502 spaces and 539 spaces, respectively). However, assuming a 90 percent effective capacity of the parking garage (which would correspond to an effective supply of 500 spaces), there would continue to be a parking shortfall during the peak hours of peak days, but it would not be considered to be a significant impact.

Loading: The Option F plan would be somewhat more convenient for delivery vehicles to travel between the U.S. 101 on- and off-ramps at Industrial/Aleman and the project site as compared to the proposed project in the DEIR. Under Option F, delivery vehicles would enter the loading area from Waterloo Street and exit onto Loomis Street (as compared to entering from Loomis Street and exiting to northbound Bayshore Boulevard with the proposed project). Delivery vehicles entering the loading area would access Waterloo Street from northbound Bayshore Boulevard, whereas vehicles exiting the loading area would turn left onto northbound Loomis Street to access Oakdale Avenue and Bayshore Boulevard. Loading impacts would be less-than-significant.

Pedestrians: The Option F plan would also establish a pedestrian crosswalk on the south side of the new project driveway/Bayshore Boulevard intersection. Since the existing intersections of Bayshore/Oakdale and Bayshore/Cortland are about 1,350 feet apart, this new crosswalk would enhance pedestrian circulation in the area. The signal timing of the new intersection would be incorporated into the signal timing scheme with other two intersections. It is anticipated that pedestrians would be able to cross during the westbound signal phase (i.e., when vehicles would exit the project site). However, since vehicles would be able to turn left from the project site to southbound Bayshore Boulevard, there would be the potential for vehicular/pedestrian conflicts at the new crosswalk. To address this issue, an exclusive pedestrian walk phase (with pedestrian actuation) would be provided by the project sponsor, which may somewhat increase vehicular delays and the potential for queues to develop on Bayshore Boulevard and the project driveways. However, the intersection would continue to operate at an acceptable level when the walk-phase is operated. The Option F impacts on pedestrians would be less-than-significant.

In common with the project analyzed in the DEIR, Option F would not have any significant impacts on transit, bicycle traffic, and construction.

Air Quality

The Option F plan would have virtually the same air quality effects as the proposed project analyzed in the DEIR. The transportation sources of air quality would vary only in the route of the delivery trucks at the south end of the project site. The loading area would be closer to a sensitive receptor, The Big City Montessori School located at 240 Industrial Street at the northeast corner of Loomis Street, about 300 feet south of the project, however, there would still be no significant impact on local air quality in the project area.

The analysis of air quality impacts in the DEIR examined the worst-case conditions of local pollutants such as carbon monoxide and diesel particulates. Carbon monoxide (CO) concentrations were predicted adjacent to the intersections where the highest concentration would be expected. The intersections where the highest concentration would be expected are the same under the proposed project and under the proposed project with Option F plan. Concentrations at the identified sensitive receptors would be less than at these worst-case intersection locations. Since no CO violations were found at the worst-case locations, no violations would be forecast at the identified sensitive receptors.

Regional emissions from auto travel of reactive hydrocarbons and oxides of nitrogen (two precursors of ozone), and PM₁₀ (particulate matter, 10 micron) can affect regional air quality outside the project vicinity. In common with the proposed project, the Option F project plan-generated increase in vehicle emissions would exceed the BAAQMD threshold of significance for emissions of reactive organic gases (ROG), and would be considered to have a significant adverse environmental effect on regional air quality.

The analysis of diesel exhaust risks in the DEIR was performed along Loomis Street, which was identified as a worst-case location for diesel particulates. For the Option F plan, the risks were calculated at the location of highest exposure, on the east side of Loomis Street opposite the proposed Home Depot loading docks, and assumed a 40-year exposure, which is beyond the amount of exposure that would occur for a day care attendee/staff at the Montessori School. Since risks at this worst-case location were found to be less than significant, risks at the more distant Big City Montessori School and the Bernal Heights residential area would also be less than significant.

The mitigation measure in the DEIR for construction air quality would still apply to Option F.

Noise

The noise impacts for Option F would be similar to the proposed project analyzed in the Initial Study in Appendix A of the DEIR which concluded that operational, construction, and traffic-generated noise would not be considered significant. The loading area would be at the south end of the building with ingress on Waterloo Street and egress on Loomis Street. Similar to the proposed project, the loading area would be shielded from any sensitive noise receptors. The impacts of noise of Option F would be similar to the project and would not be significant.

Hazardous Materials

The impacts associated with hazardous materials for the Option F plan would be the same as those analyzed in the DEIR for the proposed project. The mitigation measures for hazardous materials during construction discussed in the DEIR would still apply. Compliance with an approved Site Mitigation Plan and existing regulations would reduce any potential impacts related to contaminated soil or groundwater to a less-than-significant level. With mitigation, the proposed project Option F plan would not result in significant impacts related to hazardous materials located on the project site.

Cultural Resources

Option F would have the same consideration for cultural resources as the proposed project analyzed in the DEIR. Given the multiplicity of documented, prehistoric deposits in the project area, the project site should be deemed a zone of high prehistoric/protohistoric archeological sensitivity, the same as the proposed project. With implementation of the mitigation measure described for the proposed project, impacts on subsurface cultural resources of the proposed project with Option F would be reduced to a level of insignificance.

Growth Inducement

Option F would have the same effects on growth inducement as the proposed project analyzed in the DEIR. Option F would intensify the use of the site, but would not be expected to substantially alter development patterns in the northwest Bayview Hunters Point area or elsewhere in San Francisco. The number of anticipated shoppers would be the same as the proposed project.

The number of on-site employees relocating from outside San Francisco would be small in proportion to San Francisco's overall population, and would not represent a substantial growth in population or concentration in the neighborhood, City, or region.

Option F is located in an urban area and would not necessitate or induce the extension of municipal infrastructure. The project may induce commercial growth in the area, but such growth would be part of the planned growth for the City. Therefore, the proposed project would not have a significant effect on growth inducement.

Conclusion

Option F would have almost identical impacts as the proposed project analyzed in the DEIR. As with the original proposed project, Option F, with mitigation, would have the following unavoidable significant impacts in the areas of air quality and traffic:

- The proposed Option F plan would exceed the BAAQMD threshold of significance for regional emissions of reactive organic gases (ROG). This is an unmitigable project level and cumulative impact.

- The proposed Option F plan would have a significant unmitigable contribution to the 2015 adverse cumulative conditions on the U.S. 101 Freeway northbound on-ramp at Alemany Boulevard/Industrial Street; the U.S. 101 Freeway southbound on-ramp at Alemany Boulevard/Industrial Street; the U.S. 101 Freeway northbound on-ramp at Bayshore Boulevard/Cesar Chavez Street; the U.S. 101 Freeway southbound on-ramp at San Bruno Avenue; and the I-280 Freeway westbound on-ramp at Alemany Boulevard.

The mitigation measures listed in the DEIR would apply to Option F. The improvement measure for cumulative conditions at Bayshore Boulevard and Silver Avenue identified in the DEIR would also apply to Option F.

C. LIST OF PERSONS COMMENTING (in alphabetical order)

The following individuals submitted written comments during the public comment period March 29, 2003 through July 11, 2003, and/or provided oral testimony at the public hearing on July 10, 2003, on the 491 Bayshore Boulevard Home Depot Draft EIR.

Charles M. Abrams, President, Abrams Associates (Planning Commission Public Hearing comments, July 10, 2003; written comments, July 11, 2003)

Naomi Adelson, Resident (written comments, July 5, 2003)

Akim Aginsky, Resident (written comments, July 5, 2003)

Kathy Allen, Resident (written comments, July 6, 2003)

Jim Allison, Resident (Planning Commission Public Hearing comments, July 10, 2003)

Michael Antonini, Commissioner (Planning Commission Public Hearing comments, July 10, 2003)

Eve Bach, Arc Ecology (Planning Commission Public Hearing comments, July 10, 2003; written comments, July 24, 2003)

Scott Barlow, Resident (written comments, July 10, 2003)

Amy Beinart, Resident (Planning Commission Public Hearing comments, July 10, 2003; written comments, July 7, 2003)

Shelley Bradford Bell, Planning Commission President (Planning Commission Public Hearing comments, July 10, 2003; written comments, July 10, 2003)

Judy Berkowitz, Resident (for Doris Vincent, Resident) (Planning Commission Public Hearing comments, July 10, 2003)

Mike Boss, Resident (written comments, July 5, 2003)

Rev. Edgar Boyd, Commissioner (Planning Commission Public Hearing comments, July 10, 2003)

Jorge Bustos, Resident (Planning Commission Public Hearing comments, July 10, 2003)

Rob Caldwell, Resident (Planning Commission Public Hearing comments, July 10, 2003)

Aida Calico, Resident (Planning Commission Public Hearing comments, July 10, 2003)

Sharon Carew, Resident (written comments, May 1, 2003)

David Chatfield, Resident (written comments, July 5, 2003)

Mae Chesney, Resident (written comments, July 9, 2003)

Charles Clary, Resident (Planning Commission Public Hearing comments, July 10, 2003)

Linda Cook, Business Owner (Planning Commission Public Hearing comments, July 10, 2003)

Larry Cruz, President, Bernal Heights Neighborhood Center (Planning Commission Public Hearing comments, July 10, 2003)

Scott E. Cunningham, Resident (written comments, July 8, 2003)

Brent Daniel, Resident (Planning Commission Public Hearing comments, July 10, 2003)

John Daniel, Resident (Planning Commission Public Hearing comments, July 10, 2003)

VII. COMMENTS AND RESPONSES
LIST OF PERSONS COMMENTING

Larry Dean, Resident (Planning Commission Public Hearing comments, July 10, 2003)

John DeGarmo (Planning Commission Public Hearing comments, July 10, 2003)

Melissa M. Diagana, Resident (written comments, July 2, 2003)

Shannon Dodge, Resident (written comments, July 10, 2003)

Daniel Dodt, Resident, Chair of the BVHP-PAC Economic Development Committee, Member of the Bayview Merchants Association and Revere Avenue Residents Association (Planning Commission Public Hearing comments, July 10, 2003; written comments, July 10, 2003)

Cindy Ehrlich, Resident (written comments, April 6, 2003)

Larry Epstein, Resident (written comments, June 28, 2003)

Pam Ernst, Resident (written comments, July 8, 2003)

Lisa Feldstein, Commissioner (Planning Commission Public Hearing comments, July 10, 2003)

Jean Field, Resident (written comments, July 10, 2003)

Mary Fitzgerald, Resident (written comments, July 8, 2003)

Jean Fontana, Resident (written comments, June 3, 2003)

Ellen M. Frank and Joseph Majer, Residents (written comments, July 10, 2003)

Rick Gerharter, Resident (Planning Commission Public Hearing comments, July 10, 2003, written comments, July 5, 2003)

Michael Grafton and David Ayoob, Co-Presidents, Cortland Merchants Association (written comments, July 2, 2003)

Jonathan Gray, Resident (written comments, July 6, 2003)

Sophia Green, Resident (written comments, July 8, 2003)

David Gregmore, Resident (Planning Commission Public Hearing comments, July 10, 2003)

Nic Griffin, Resident (written comments, July 9, 2003)

Phoebe Grigg, Resident (Planning Commission Public Hearing comments, July 10, 2003; written comments, July 8, 2003)

Phillip Guan, President, San Bruno Avenue Merchants Association (written comments, July 10, 2003)

John Hayes, Resident (Planning Commission Public Hearing comments, July 10, 2003)

Robert Heacock, Resident (Planning Commission Public Hearing comments, July 10, 2003)

Martha S. Herman, Resident (written comments, June 30, 2003)

Susan Hershey and Judge Auffinger, Residents (written comments, July 8, 2003)

Sue C. Hestor, Attorney at Law, on behalf of Cole Hardware (Planning Commission Public Hearing comments, July 10, 2003; written comments, July 10, 11, and 15, 2003)

Jeff Hoffman, Resident (Planning Commission Public Hearing comments, July 10, 2003; written comments, June 9, 2003)

Douglas Holloway (Planning Commission Public Hearing comments, July 10, 2003)

Kevin Hughes, Commissioner (Planning Commission Public Hearing comments, July 10, 2003)

Alyson Jacks, Resident (written comments, May 1, 2003)

Sara Jacobs, Resident (written comments, June 9, 2003)

Dwayne Jusino, President, Community Alliance of Portola & Silver Terrace (Planning Commission Public Hearing comments, July 10, 2003; written comments, July 10, 2003)

Terezina Jusino, Resident (Planning Commission Public Hearing comments, July 10, 2003)

Rachel Kesel, Resident (Planning Commission Public Hearing comments, July 10, 2003)

Angelo King, Resident (Planning Commission Public Hearing comments, July 10, 2003)

Kathleen King, Resident (written comments, June 28, 2003)

Ken Kirsch, Resident (written comments, July 2, 2003)

Amy Kyle, Resident (Planning Commission Public Hearing comments, July 10, 2003; written comments, July 9, 2003)

Barbara Kyle, Resident (Planning Commission Public Hearing comments, July 10, 2003; written comments, July 24, 2003)

Lynnly Labovitz, Resident (written comments, July 5, 2003)

Jeremy and Janice Lane, Residents (written comments, July 4, 2003)

Michael D., Linda, Catriona, Hanh, and Michael L. Larson, Residents (written comments, July 6, 2003)

Bill Lee, Commissioner (Planning Commission Public Hearing comments, July 10, 2003)

Philip Lerner, Business Owner (written comments, April 11, 2003)

Deborah Levy, Resident (Planning Commission Public Hearing comments, July 10, 2003; written comments, July 1, 2003)

Joshua Levy, Resident (written comments, July 6, 2003)

Rosanne Liggett, Resident (Planning Commission Public Hearing comments, July 10, 2003; written comments, May 1, 2003)

Liz Linale, Resident (Planning Commission Public Hearing comments, July 10, 2003)

Mark Lynch, Resident (Planning Commission Public Hearing comments, July 10, 2003)

Jo Ann Madigan, Resident (written comments, undated)

Max and Ben Malakoff, Residents (written comments, July 5, 2003)

Mollie Maloney, Resident (Planning Commission Public Hearing comments, July 10, 2003)

Gary A. Marcus, Resident (written comments, July 6, 2003)

Ingrid Mardeson, Resident (Planning Commission Public Hearing comments, July 10, 2003)

Eugenie Marek, Resident (written comments, April 26, 2003)

Michael Marrelli, Resident (written comments, July 9, 2003)

Dale Martin, Resident (written comments, July 3, 2003)

Katherine Massey, Resident (Planning Commission Public Hearing comments, July 10, 2003)

VII. COMMENTS AND RESPONSES
LIST OF PERSONS COMMENTING

Nina Mayer, Resident (written comments, July 7, 2003)
Patricia F. McManus, Resident (written comments, May 3, 2003)
Cesar Mendoza, Resident (Planning Commission Public Hearing comments, July 10, 2003)
Jim Miglino, Resident (written comments, July 8, 2003, with Pheobe Grigg)
Amy C. Miller and Virginia Bowen, Residents (written comments, May 9, 2003)
Michael Miller, Resident (Planning Commission Public Hearing comments, July 10, 2003)
Gretchen Mokry, Resident (Planning Commission Public Hearing comments, July 10, 2003)
Robert Mokry, Resident (Planning Commission Public Hearing comments, July 10, 2003)
Chris Ellen Montgomery, Resident (Planning Commission Public Hearing comments, July 10, 2003)
Ron Morgan, Resident (Planning Commission Public Hearing comments, July 10, 2003; written comments, June 27 and July 24, 2003)
Laurel Muniz, Resident (Planning Commission Public Hearing comments, July 10, 2003)
Bill Nieto, Resident (Planning Commission Public Hearing comments, July 10, 2003; written comments, June 16, 2003)
Chava Nieto, Resident (written comments, June 15, 2003)
Al Norman, Resident (Planning Commission Public Hearing comments, July 10, 2003)
Patrick J. O'Brien, Resident (written comments, July 5, 2003)
Joe O'Donoghue (Planning Commission Public Hearing comments, July 10, 2003)
Jo Ann Ogden, Resident (written comments, June 28, 2003)
Chris Pagels, Resident (written comments, June 29, 2003)
Barbara Paley, Resident (written comments, July 8, 2003)
Eloise Patton, Resident (Planning Commission Public Hearing comments, July 10, 2003)
Gil Payne, Resident (Planning Commission Public Hearing comments, July 10, 2003)
Joe Pecoro, Resident (Planning Commission Public Hearing comments, July 10, 2003)
Albert Perez, Resident (written comments, July 5, 2003)
Reneé Rausin, Resident (written comments, May 14, 2003)
Roy Recio, Resident (Planning Commission Public Hearing comments, July 10, 2003)
Jim Rodriguez, sf-pt.com, (written comments, May 28, 2003)
Lisa Rosenberg, Resident (written comments, July 8, 2003)
Peter Rothblatt, Resident (written comments, July 10, 2003)
Deborah Ruskay, Resident (written comments, undated)
Rick Rutledge, Resident (Planning Commission Public Hearing comments, July 10, 2003)
Ali Saeed (Planning Commission Public Hearing comments, July 10, 2003)
Yolanda S. Salazar, Resident (written comments, undated)

Gilda Serrano, Resident (written comments, undated)

Leah Shahum, Executive Director of the San Francisco Bicycle Coalition (written comments, July 11, 2003)

Ken Shelf, Resident (written comments, June 26, 2003)

Rich Shelton, Resident (Planning Commission Public Hearing comments, July 10, 2003)

Anna Shimko, Attorney at Law for Home Depot (Planning Commission Public Hearing comments, July 10, 2003; written comments, July 11, 2003)

Joseph Smook, Resident (Planning Commission Public Hearing comments, July 10, 2003)

Aidan Smyth, Resident (written comments, undated)

Dan Sobel, Resident (written comments, July 8, 2003)

Gina Solomon, Resident (Planning Commission Public Hearing comments, July 10, 2003; written comments, July 3, 2003)

Steve St. Denny, Business Owner (Planning Commission Public Hearing comments, July 10, 2003)

Dory Steinberg, Resident (Planning Commission Public Hearing comments, July 10, 2003)

Gina Surber, Resident (written comments, July 6, 2003)

James Tam, Resident (Planning Commission Public Hearing comments, July 10, 2003)

Rev. Arnold Townsend, Resident (Planning Commission Public Hearing comments, July 10, 2003)

Katherine Truka, Resident (written comments, July 5, 2003)

Royce H. Vaughn (written comments, July 10, 2003)

Mauricio Vela, Executive Director, Bernal Heights Neighborhood Center (Planning Commission Public Hearing comments, July 10, 2003)

Leora Vestel, Resident (Planning Commission Public Hearing comments, July 10, 2003)

Eleanor Vinsant, Resident (written comments, May 10, 2003)

Jennifer Ware, Resident (written comments, July 7, 2003)

Patricia Wayman, Resident (written comments, July 9, 2003)

Linda Weiner, Resident and Director of Air Quality Advocacy for the American Lung Association (written comments, July 7, 2003)

Chris Witteman, Resident (Planning Commission Public Hearing comments, July 10, 2003; written comments, July 9, 2003)

Marci Yellin, Resident (written comments, July 8, 2003)

Paula Young, Resident (written comments, June 14, 2003)

Randy Zarcher, Resident (written comments, undated)

David Ziegler, Resident (written comments, June 5, 2003)

D. COMMENTS AND RESPONSES

PROJECT DESCRIPTION

Comment #1

"Cover photo [of the DEIR:] [T]here is no comparable photo of the project anywhere in the EIR. A photo that superimposes the project on the real site should be included. Including any signage. Please provide.

"Pages 38 and 39 [of the DEIR:] [P]hotos - Where are the 'after' photos that match these 'before' ones? This EIR is seriously lacking in explanatory photos and graphics. Also, include a photo showing the site as it will be seen coming down Cortland and as it is approached on 101 and 280. A perspective from Bayview would also be helpful. Please include all signage in the 'after' renderings."

"Won't Home Depot have a large elevated sign? Please show it." (*Sue C. Hestor, Attorney at Law, on behalf of Cole Hardware*)

Response #1

The Initial Study concluded that the potential visual quality effects of the project would not be considered significant so the EIR did not address visual impacts and urban design. The EIR did not include further analysis or discussion of the visual and design features of the project, including a photo of the proposed project superimposed on the project site (a "photomontage"). The signage for the proposed project is shown on page 32 of the DEIR in Figure 6: Elevations. The project would include one business sign on the Bayshore Boulevard facade. No elevated signs are proposed above the cornice level of the proposed building.

Nonetheless, the project sponsor has prepared four figures for informational purposes that show existing views (inset) with photomontages of the proposed project. These four perspectives include a view of the Bayshore Boulevard and Waterloo Street Frontage Looking Northeast (Figure C&R.2), a view of the Loomis Street Frontage Looking North (Figure C&R.3), a view of the Bayshore Boulevard Frontage Looking Southeast (Figure C&R.4), and a view Looking East on Cortland Avenue (Figure C&R.5) on pages C&R.21 to C&R.24. These additional informational photos do not change the conclusion in the Initial Study. The proposed project would not result in potentially significant visual impacts, as the visual effect of the proposed project would be consistent with the character of the surrounding area, and it would not block any scenic views or public vistas.



View with Proposed Project



Existing View

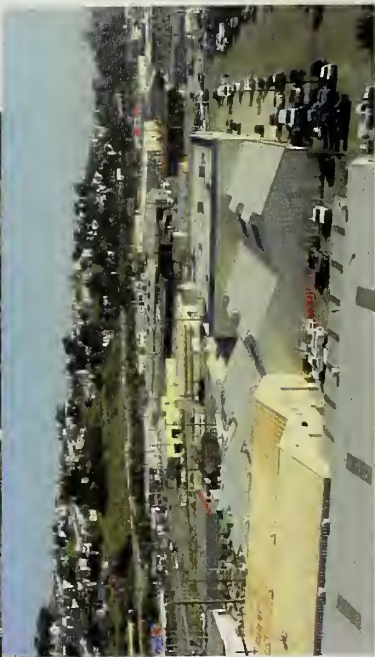
Source: Greenberg Farrow Architecture

6-21-05

VIEW OF THE BAYSHORE BOULEVARD AND WATERLOO STREET FRONTAGE LOOKING NORTHEAST **FIGURE C&R 2**



View with Proposed Project



Existing View

Source: Greenberg Farrow Architecture
6/24/05

VIEW OF THE LOOMIS STREET FRONTAGE LOOKING NORTH **FIGURE C&R 3**



View with Proposed Project



Existing View

Source: Greenberg Farrow Architecture

6/24/05

VIEW OF THE BAYSHORE BOULEVARD FRONTAGE LOOKING SOUTHEAST FIGURE C&R 4



View with Proposed Project

Source: Greenberg Farrow Architecture
6-21-05

Existing View

VIEW LOOKING EAST ON CORTLAND AVENUE FIGURE C&R 5

Comment #2

"[T]he project is mischaracterized as being 'near the eastern border of the Bernal Heights neighborhood.' (DEIR page 3). The site is on the border of Bernal Heights, as the site is directly across the street, and will thus have substantial and significant negative effects on the residents of that neighborhood." (*Jeff Hoffman, Resident*)

Response #2

The San Francisco Planning Department's designation of the Bayview Hunters Point Neighborhood abuts the eastern border of the U.S. 101 Freeway and includes both sides of Bayshore Boulevard (essentially the M-1 zoning shown in Figure 7 on page 36 of the DEIR). The Bernal Heights neighborhood designation on the Planning Department's maps for the *Community Planning in the Eastern Neighborhood Rezoning Options Workbook* (Draft, February 2003) shows the eastern border on the west side of U.S. 101. The proposed project would be on the east side of Bayshore Boulevard near the Bernal Heights neighborhood, as noted on page 3 in the DEIR.

Comment #3

"What happened to the study to relocate the main vehicular entrance to this store? The public was told that, to mitigate the impacts of traffic at the entrance/exit, there was an effort to relocate the main entrance to Loomis. Why is the main entrance still a straight line extension of Cortland Street, when that street will absorb much of the negative impacts of the project traffic?" (*Sue C. Hestor, Attorney at Law, on behalf of Cole Hardware*)

"I live right near the corner of Nevada and Cortland. I'm not affiliated with any group here tonight. I would like to address a couple of things with the EIR. I heard some talk tonight that Home Depot has made a change of their entrance to Loomis Street. Now I would submit to you if they have materially changed their proposal, and that is a material change, that you then have to go back and re-look at your figures here." (*Chris Witteman, Resident, oral testimony*)

"No consideration of access to parking from Loomis Street. Home Depot should not be allowed to change project at last minute without study." (*Chris Witteman, Resident, written comments*)

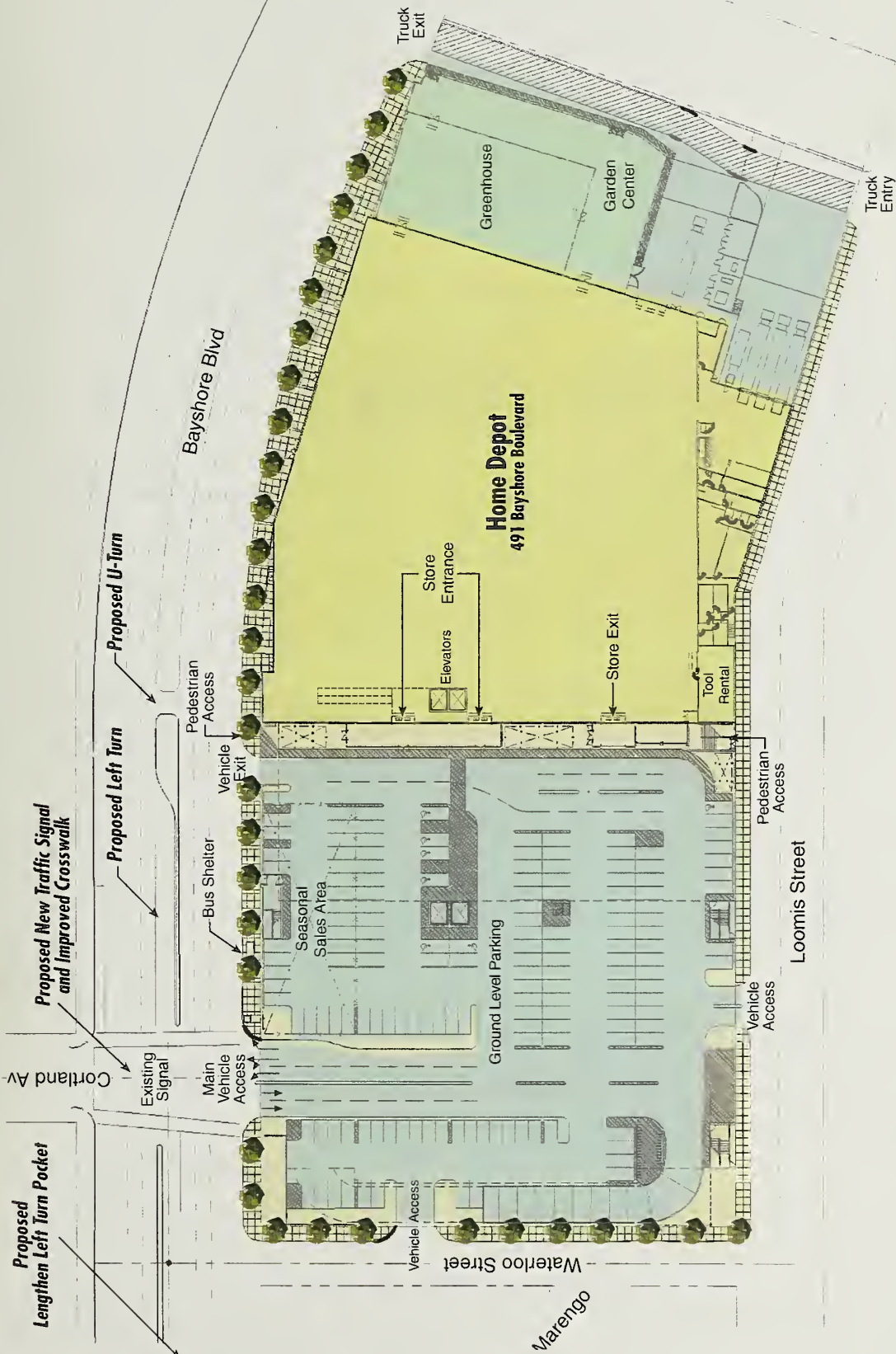
Response #3

The main vehicular entrance to the project was always planned to be opposite the Cortland/Bayshore intersection to allow for traffic light control in and out of the project on Bayshore (as shown in Figures C&R.6 and C&R.7, pages C&R.27 and C&R.28. Figure

C&R.6 replaces Figure 2 of the DEIR). As originally proposed, the plans had no ingress or egress on Loomis Street. The addition of the Loomis Street driveway was proposed by Home Depot as a result of discussions with Planning Department staff in order to alleviate some of the traffic at the proposed project's Bayshore entrance. Home Depot has proposed using Bayshore Boulevard for its primary driveways because it is a major arterial and fronts the proposed Home Depot. However, in response to comments submitted on the DEIR, an option using Loomis Street as the main project driveway has been analyzed for consideration by the Planning Commission. Please see Response to Comment #74.

The transportation analysis and the DEIR studied the driveways that are currently proposed, including the Loomis Street driveway. The project site would be served by four ingress driveways: three ingress driveways for customers and employees, and one ingress driveway for delivery vehicles. The main vehicle entrance and exit for the project site would be located at the eastern side of the existing Bayshore Boulevard and Cortland Avenue intersection and would allow full entry and exit to the site. Secondary entrance/exit driveways would be located on Loomis Street and Waterloo Street. Six options for garage ingress and egress were studied and are discussed in Response to Comment #74.

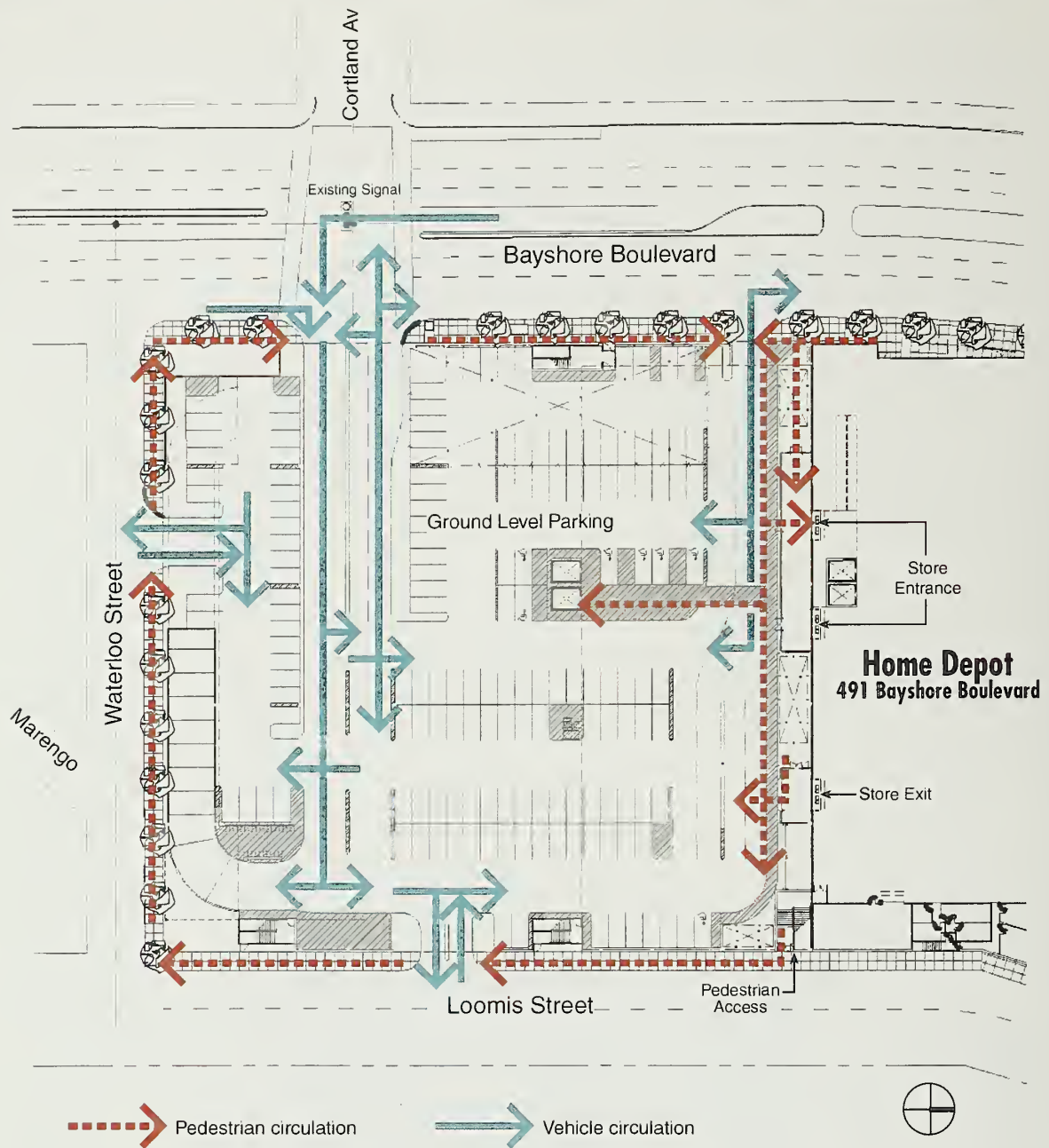
All driveways would serve the ground level of the parking garage and provide access to the parking garage ramp; however, the Waterloo Street driveway would primarily serve the small parking area located underneath and south of the ramp. An additional secondary exit-only driveway would be located at the north end of the ground floor of the parking garage, and would provide right-turn only egress to northbound Bayshore Boulevard. Access for the delivery vehicles would be inbound from Loomis Street and outbound to Bayshore Boulevard (right-turn only).



Source: Greenberg Farrow Architecture

2/1/05

SITE PLAN FIGURE C&R 6
(Revised EIR Figure 2)



Source: Greenberg Farrow Architecture

(6-24-05)

PARKING GARAGE — GROUND FLOOR FIGURE C&R 7

Comment #4

"What I am frustrated about is that you continue to have EIRs that show non-existent streets. They have all these little streets that make you think maybe they could get off of Bernal Heights going across Bayshore on some other place. The real world is this is a Muni map; official city map – that shows that there is nothing here. If you are in Bernal Heights you can either go down Cortland to Bayshore, or go down Cortland to Mission Street. On Saturdays it is very difficult to get off of Bernal Heights to the east, because we can't go another auxiliary route, which is go down to the farmers market, because it is a zoo on Saturday. On page 28, which is the page right after that, it is the first page of the plot map of this project. And what you will see is there's one pedestrian access for this entire site, and the site is enormous. Everything else is vehicle-accessed. The main vehicle access is straight down Cortland, and the EIR was delayed at length for a Loomis Street alternative, and it is not here. That was a year of delay on this project – was [that] they said they were doing the entrance off of Loomis Street. So you have a totally pedestrian-unfriendly project." (*Sue C. Hestor, Attorney at Law, on behalf of Cole Hardware, oral testimony*)

"Page 27 and similar maps [in the DEIR:] Streets are shown north of Home Depot crossing under 101. Eliminate from all maps streets that do not exist even if they are mapped somewhere as vestiges before 101 was built. We do not show streets under the Bay as though they exist. This is no different.

"Again, eliminate [on the maps] those streets crossing 101 north of this site. They do not exist. Also, make sure the 'streets' shown under the 101/280 interchange in fact exist as streets. The street pattern differs from that on page 42." (*Sue C. Hestor, Attorney at Law, on behalf of Cole Hardware, written comments*)

"With regards to the accuracy, I think that the EIR in its final version is going to need to be accurate, in the sense that on page 27, where we have a map, and the map shows a number of streets that for all intents and purposes appear to cross the freeway – that I don't believe do. So we would need to correct that." (*Kevin Hughes, Planning Commissioner*)

Response #4

The commenters are correct that the three unlabeled streets – Costa, Faith and Joy Streets, shown in DEIR Figures 1, 7, 10 and 11 (on pages 27, 36, 46, and 52) – do not extend under the U.S. 101 Freeway. There is a pedestrian bridge that crosses the freeway from the terminus of Joy Street to Bayshore Boulevard. Figures C&R.8 through C&R.11 (which replace DEIR Figures 1, 7, 10 and 11) on pages C&R.30 through C&R.33 show the street patterns and illustrate that only Cortland Avenue passes under the freeway between Cortland and Cesar Chavez Street. The DEIR transportation analysis did not assume that Costa, Faith and Joy Streets were through streets, so the revised figures do not affect the transportation analysis of the project.

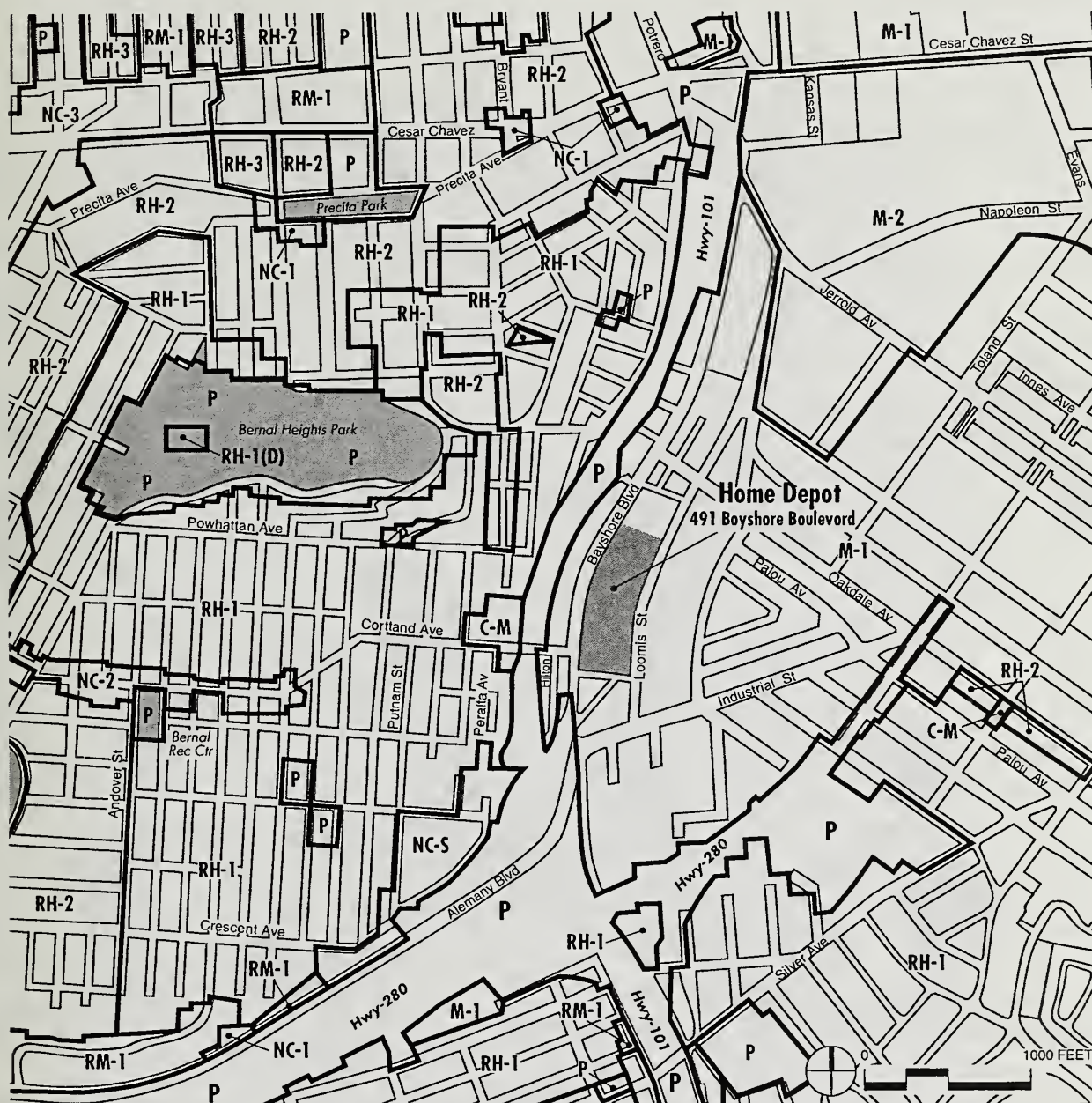
VII. COMMENTS AND RESPONSES
PROJECT DESCRIPTION



Source: During Associates

6/24/05

PROJECT LOCATION **FIGURE C&R 8**
(Revised EIR Figure 1)



- | | | | |
|-------------------------|---|------------------------------|-----------------------------------|
| RH-1, RH-2, RH-3 | House Character districts | C-M | Commercial district |
| RM-1 | Mixed House and Apartment Character districts | M-1, M-2 | Industrial district |
| P | Public Use district | NCD, NC-S, NC-1, NC-2 | Neighborhood Commercial districts |

Source: City and County of San Francisco Planning Department

6-24-05

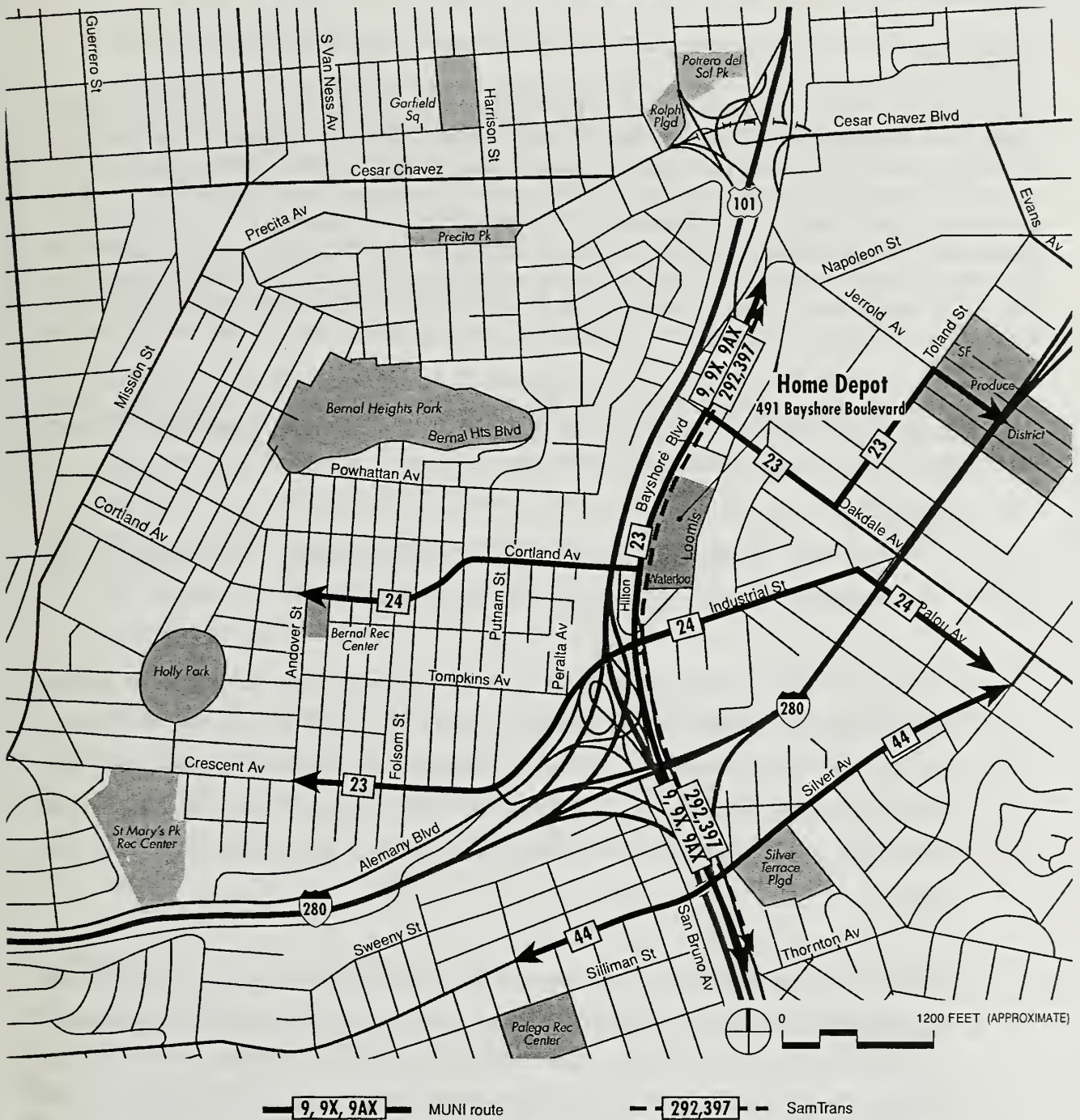
ZONING DISTRICTS **FIGURE C&R 9**
(Revised EIR Figure 7)

VII. COMMENTS AND RESPONSES
PROJECT DESCRIPTION



Source: Wilbur Smith Associates
6-24-05

ROADWAY NETWORK AND INTERSECTION ANALYSIS LOCATIONS **FIGURE C&R 10**
(Revised DEIR Figure 10)



Source: Wilbur Smith Associates
6-24-05

EXISTING TRANSIT NETWORK **FIGURE C&R 11**
(Revised EIR Figure 11)

Comment #5

"Page 28 [of the DEIR:] If a person parks on Loomis Street, for example, because they don't want to queue for the garage, where will they be able to enter through a pedestrian entrance? How many feet of walking would it be if they parked at the 'Loomis Avenue' legend on the drawing? Do they have to walk all around to the 'pedestrian access?' What amount of entry/exit traffic will they have to walk thru to get to that point? How hazardous will it be if they walk in one of the 'vehicle access' driveways? When Goodman was in operation, customers and employees routinely parked on Bayshore, Loomis, Waterloo, and other nearby streets when the lots were full, during times of big sales, or simply because a curb space was available. How much curb parking is available in a 300-foot radius of this site? What streets will people be coming down? What is the condition of the sidewalks?

"Why is there no direct access into the store, only a pedestrian entrance from the garage? Aren't those parking spaces along the pedestrian path in what is labeled 'seasonal sales area'?" (*Sue C. Hestor, Attorney at Law, on behalf of Cole Hardware*)

Response #5

The DEIR incorrectly made reference to "Loomis Avenue." All references in the DEIR to "Loomis Avenue" are changed to "Loomis Street."

The main pedestrian entrance to the store is on the south side of the building on the ground (first floor) level. There would be another entrance on the garage's second level, which accesses the mezzanine area of the store. Customers would access the proposed store through the garage, primarily for convenience as well as security. Due to the nature of the use, most customers would arrive in vehicles, and enter and exit the store from within the garage.

There are separate pedestrian access points to the store on Bayshore Boulevard and Loomis Street at the north end of the garage adjacent to the proposed store (see Figure C&R.6 on page C&R.27, which is replacing DEIR Figure 2 on page 28, and Figure C&R.7 on page C&R.28). Pedestrians would access the walkway, at the north end of the garage, and enter the store through the same entrance as all customers.

New sidewalks ranging from ten to twelve feet wide would replace the existing sidewalks, along the Bayshore, Loomis, and Waterloo street frontages, which have deteriorated and need to be the same elevation as the ground floor level of the new building along Bayshore Boulevard. There generally would be sufficient parking in the garage; however, if customers were to park on streets near the project, they could safely walk to the store via the pedestrian

walkway between the garage and the Home Depot store, then access the store through the main entrance. Due to a grade difference of approximately four to six feet from the first level of the store down to Loomis Street, there would be stairs connecting to the pedestrian walkway.

Pedestrian access to the store would be clearly marked, discouraging pedestrians from entering and exiting the store via the vehicular driveways.

The DEIR noted on page 53 under the heading "Parking Conditions" that, in general, the on-street parking throughout the study area is unmetered and unrestricted with the exception of street cleaning restrictions. Approximately 125 on-street parking spaces were identified on Bayshore Boulevard and Loomis Street, of which about 50 percent were estimated to be occupied on the weekday and weekend afternoon periods. There are an additional ten spaces on Waterloo and Marengo Streets, for a total of 135 parking spaces within a 300-foot radius of the project site.

There would be a "seasonal sales area" in the ground floor parking area (see Figures C&R.6 and C&R.7) that would occupy approximately 26 parking spaces for a duration of about one week, four to six times a year, except during December when the area will be used for the sale of Christmas trees for about three weeks (also see Response #91 regarding parking supply).

Comment #6

"Page 26 [of the DEIR:] There is no delineation of how many, and what kind, of parking spaces are on each floor, only a total of 550 spaces. Provide detail.

"Page 28 [of the DEIR:] How much parking on this [ground floor] floor? What types? How wide is Waterloo? What is its traffic capacity, if people will be turning left into the 'vehicle access' for Home Depot? If there is development on the south side of the street, i.e., a Pier One Imports, how will traffic on Waterloo be affected?

"Page 29 [of the DEIR:] Ground Floor: Where does the 'down' ramp touch down? How wide are the 'in' and 'out' lanes? One lane or two to the upper floor? Please 'blow up' the garage rendering and show the paths of travel for:

- "pedestrians, including those walking to cars on this floor
- "cars trying to access handicapped parking
- "cars coming to 'loading'
- "cars entering - for each 'vehicle access'

"cars leaving - for each 'vehicle access'

"Please put numbers – of pedestrians, vehicles – coming into Home Depot building, and into each area (e.g., 'loading'). What level of pedestrian traffic on sidewalks in front of the three 'vehicle access'?"

"What cars are expected to park on this [ground] floor? Is it first come, first park? At any point during the day? If not, how will it be controlled? Will people entering the main entrance be allowed to turn left (at the two breaks) to access that parking? What is the queuing capacity inside the building if the ramp is backed up? How would cars coming in the three entrances merge on this floor? How would it be insured that traffic does not back up into Bayshore at the main vehicle access entrance? Won't there be interference with pedestrians crossing through that traffic to access parking space towards Waterloo?"

"Explain arrows for three lanes leaving the garage. One right onto Bayshore? One straight ahead onto Cortland? One left onto Bayshore? Will this exiting pattern be controlled by a Cortland/Bayshore signal phase? Can right turns occur at any time?"

"Page 30 [of the DEIR:] Second Level - How many parking spaces on this level?"

"Page 31 [of the DEIR:] Third Level - How many parking spaces on this level? Who will see this roof? Is it higher than the freeways? What will a trellis along the periphery screen, particularly for areas that see the project from above, rather than 'across'?" (*Sue C. Hestor, Attorney at Law, on behalf of Cole Hardware*)

Response #6

To the extent that the number of parking spaces on each floor, ramp location and internal circulation impact traffic on the surrounding streets (such as Cortland, Bayshore, or Waterloo), those impacts have been analyzed in the transportation section of the DEIR (pages 42 through 81). The following response and Figure C&R.7 on page C&R.28 provide the information requested by the commenter. Parking spaces for the project are schematically represented in Figures 2, 3, 4 and 5 of the DEIR (on pages 28 to 31). Figure C&R.6 on page C&R.27 replaces Figure 2 and shows 160 parking spaces on the ground floor (including 6 disabled). Figure 4 in the DEIR shows 140 spaces on the second level (5 disabled), and Figure 5 in the DEIR shows 239 spaces (10 disabled) on the rooftop for a total of 539 spaces, 11 fewer spaces than described in the DEIR. The DEIR has been revised to change all descriptions of 550 spaces to 539 spaces (see Section E – Staff-Initiated Text Changes and Errata, specifically pages C&R.358, C&R.360, and C&R.362 to C&R. 364 for changes to the DEIR text). The reduction of 11 spaces does not change the conclusions of the transportation and parking analyses, because the project was estimated to have a peak demand of 502 parking spaces on a weekday and 539 parking spaces on a weekend, as stated on page 60 of the DEIR.

The proposed garage would contain approximately 31 compact parking spaces and 508 full-size spaces. The project would provide the required 21 disabled-accessible spaces; the exact location is usually determined by the City during the final plan check phase of the project.

The parking garage layout is based on similar designs for other Home Depot parking garages.¹ All entrance and exit lanes on the ground floor (as shown in Figure C&R.7) are 11 feet wide. The two-way ramp starts and ends approximately 70 feet to the south (towards Waterloo Street) of the Loomis Street entrance and exit. The ramp connections to the second floor and rooftop would be one lane wide in each direction. Pedestrians would be discouraged from walking on the ramps. Elevators to access other garage levels are located near the entrance/exits of the store. As in any parking garage, there would be pedestrians crossing the vehicle circulation routes to access parked cars and their destination.

The garage would operate on a first-come, first-park basis throughout the day. Vehicles entering from Bayshore Boulevard could turn left (at the two breaks) or turn right onto the ramp to access parking spaces on the upper floors. The two entry lanes from Bayshore Boulevard (at Cortland Avenue) could accommodate up to 14 vehicles queuing for parking spaces (two lanes, seven vehicles per lane). Vehicles entering the garage from Waterloo and Loomis Streets and Bayshore Boulevard would merge into the parking lanes at different points. Approximately 31 parking spaces under the ramp to the upper level would be accessed directly from the Waterloo Street entrance on the ground floor.

There would be three lanes leaving the garage onto Bayshore Boulevard at Cortland Avenue: a left-turn only lane onto southbound Bayshore, one crossing Bayshore onto Cortland Avenue (while also permitting left turns onto southbound Bayshore), and one right-turn only lane onto northbound Bayshore Boulevard. The exiting pattern would be controlled by a Cortland/Bayshore signal phase, and it is anticipated that right-turn on a red signal would be allowed. An exit-only egress onto northbound Bayshore Boulevard would be situated at the north end of the parking lot. There would be one lane entering the garage and one lane exiting the garage, both on Waterloo and Loomis Streets.

¹ Frank Coda, Greenberg Farrow Architects, telephone conversation, November 13, 2003.

As shown in the photomontages in Figures C&R.2 to C&R.5 and on the elevations in Figure 6 on page 32 in the DEIR, the rooftop parking would be seen from the freeways and from some residences on Bernal Heights that face Bayshore Boulevard. The height of the rooftop parking level would be about the same or lower than the adjacent freeways, which are at a higher elevation.

The rooftop trellis would be angled inward towards the parking lot, and is designed to provide a visual enhancement and screening for the Bernal Heights residents. There would be a four-foot-high solid wall around the perimeter of the rooftop parking level to prevent vehicle car headlights to shine directly into the nearby residences. There would be rooftop landscaping including trees in planter boxes to provide further screening.

Waterloo Street is twenty feet wide and lightly used. The Planning Department has received no proposal for the land south of Waterloo Street. If a specific use were proposed in the future, its potential environmental effects, together with the proposed project, would be studied. The width of Waterloo Street is adequate to accommodate the proposed project traffic, including turning movements.

Comment #7

"Page 32 [of the DEIR:] Elevations - These are the only renderings of the project and – because of the massive length of the proposed project – are so tiny as to be unreadable. Even if it takes a foldout, renderings that are readable should be included showing how this project will fit into its context and be seen at various perspectives. These are not real perspectives, but architects renderings. It is impossible to see 'people' here - unless they are the two dots over the exiting cars in the top drawing. Please also point out where the building is going to 'slump' 14 inches over 30 years as the fill that will be added subsides (p. A-18) [of the Initial Study, Appendix A in the DEIR]." (*Sue C. Hestor, Attorney at Law, on behalf of Cole Hardware*)

Response #7

The elevations were simplified and reproduced in color to allow for ease of reading. Neither the size and scale of the elevations/renderings, nor their content, would affect the environmental analysis. The DEIR is an informational document. Larger versions of the proposed elevations are available at the Planning Department for public review by appointment at 1660 Mission Street, Fifth Floor (Case File No. 2001.0062E). The

photomontages in Figures C&R.2 to C&R.5 also provide additional perspectives of the project.

While there may be settlement potential for the project, the project would be designed to accommodate any such change. The geotechnical investigation report referenced in the Initial Study on page A-18 in Appendix A of the DEIR, recommended that the project plans should "consider" long-term settlement caused by additional fill placement, and that access to the proposed building on the east side would require a transition or hinged slab to allow for anticipated long term settlement. The Initial Study also noted that potential damage to structures from geologic hazards on the project site would be mitigated through the Department of Building and Inspection (DBI) review of the building permit application pursuant to DBI implementation of the *San Francisco Building Code*.

Comment #8

"Page 1; Pages 25-26 [of the DEIR]: Description of previous use is inadequate. The description of the previous uses (Goodman Lumber and Whole Earth Access) does not include information about the amount of parking provided, although it does give dimension of the buildings. Since these previous uses provide the basis for one of the alternatives, the amount of parking (as a proxy for traffic generated) should be included in this description and/or in the description of the alternative." (*Eve Bach, Arc Ecology Consultant; Barbara Kyle, Resident/No Depot Committee Chair; and Ron Morgan, Bernal Heights Neighborhood Center Community Organizing Coordinator*)

Response #8

There were approximately 283 parking spaces provided by the previous uses on the project site. The DEIR for the proposed project assumed that the project site was completely vacant. Thus, the unoccupied site and the area adjacent to the site formed the baseline physical conditions by which the Planning Department (and ultimately the decision-makers) determines whether an impact is significant. CEQA states that alternatives in the DEIR must focus on those possible options that would avoid or substantially lessen any of the significant environmental impacts of the proposed project. The reasonable range of alternatives discussed in the DEIR (including the alternatives of no project, reuse of the site for other retail uses, and three Home Depot stores varying in square footage) describes the parking scenarios that would be accommodated on the site for each alternative. The traffic, parking requirement, and parking demand analyzed in the DEIR are based on the size of the project, not the amount of parking provided by either the existing buildings or the proposed project.

Comment #9

"Before it was the 'Whole Earth Access' site, and before it was Allstate Plywood, 401 Bayshore was an auto wrecking yard, Hayden Auto Wrecking. The statement on page 95 [of the DEIR] states that the site 'may' have been an auto wrecking yard. It was, in fact, such." (*Sue C. Hestor, Attorney at Law, on behalf of Cole Hardware*)

Response #9

The description of previous uses of the project site was based on Sanborn maps, City directories, aerial photographs, and oil and gas maps, and was summarized in the *Phase I Environmental Site Assessment (ESA)* of the project site, prepared by an independent consultant (Stechmann Geoscience, Inc. (SGI), March 20, 2001; available for public review by appointment in Case File No. 2001.0062E at the Planning Department, 1660 Mission Street, Fifth Floor, San Francisco). The report concluded that in 1967, Allstate Plywood Inc. occupied 401 Bayshore Boulevard. Prior to that date, there was no listing in the City directories. The 1957 aerial photographs indicated that there might be an auto wrecking yard at 401 Bayshore. The 1950 Sanborn maps indicated that the 401 Bayshore site was used for tire storage. Thus, the commenter may be correct that it was an auto wrecking yard, however, it would not affect the analysis of environmental impacts of the project.

Comment #10

"Page 2, pages 25-26 [of the DEIR]: [The] description of proposed buildings is incomplete. The project is described as a '153,089-square-foot (sq.-ft.) home improvement center *and* a separate parking garage for about 550 spaces.' The only information about the parking structure is its capacity and number of stories; there is no information about its dimensions. What is the total square footage for all structures in the project? Provide information about the dimensions (footprint, exact or maximum height, square footage) of the garage and its relationship to the other buildings in the DEIR. The confusion is compounded by the description of the parking garage as both separate and attached. The EIR must quantify the dimensions (schematic drawings are insufficient) to enable the public to determine if the project complies with height and bulk zoning standards." (*Eve Bach, Arc Ecology Consultant; Barbara Kyle, Resident/No Depot Committee Chair; and Ron Morgan, Bernal Heights Neighborhood Center Community Organizing Coordinator*)

"Page 26 [of the DEIR:] Why is this project covering nearly 100% (95%? 98%?) of its lot - virtually no green space or buffer around it? Why such a hard edge? Is this how Home Depot sees San Francisco?" (*Sue C. Hestor, Attorney at Law, on behalf of Cole Hardware*)

Response #10

The dimensions of the proposed project are discussed in several places in the DEIR. On pages 2 and 26, the DEIR states that the proposed project would consist of a two-story, approximately 40-foot-tall, approximately 153,089 sq.-ft. home improvement center. The store includes approximately 96,250 sq.ft. on the main floor, about 38,405 sq.ft. on the second floor, and an approximately 8,546 sq.-ft., outdoor garden center plus a 9,888 sq.-ft., enclosed greenhouse. The 539-space parking garage would contain approximately 235,597 sq.ft. The total square footage of the proposed project would be approximately 388,686 sq.ft., including all parking areas.

The square footage of the parking garage is added to page 2, paragraph 1, as follows: "The project sponsor, Home Depot, proposes to construct a two-story, approximately 153,089 sq.-ft. home improvement center with approximately 96,250 sq.ft. on the main floor, 38,405 sq.ft. on the second floor, and an approximately 8,546 sq.-ft. outdoor garden center plus a 9,888 sq.-ft., enclosed greenhouse. ~~An separate, attached,~~ **approximately 235,597 sq.-ft.** parking garage consisting of two levels with rooftop parking totaling ~~550~~ **539** parking spaces would also be constructed as a **separate structure.**"

Page 26 of the DEIR, fourth paragraph, has added at the end: "An approximately 235,597 sq.-ft. parking garage would be constructed as a separate structure that would contain the 38,405 sq.-ft. second floor sales area (which is included in the 153,089 sq.-ft. total for the home improvement center and is not included in the parking structure square footage), accessible by elevator and escalator to the ground floor sales area. The total square footage of the project would be approximately 388,686 sq.ft., including all parking areas."

The proposed store and the parking garage would consist of two independent structural systems with connections at the first and second levels between the two structures, but no connection at the roof level. The total footprint of the project, including the loading area and garden center, would be approximately 218,200 sq.ft. and would cover approximately 87.3 percent of the total site.

The approximately 235,597 sq.-ft. parking garage would be constructed as a separate structure that would contain the 38,405 sq.-ft. second floor sales area (which is included in the 153,089 sq.-ft. total for the home improvement center), accessible by elevator and escalator from the ground floor sales area (Figure 4 in the DEIR, page 30).

As noted in Figure 6 on page 32 of the DEIR, the proposed project would be 797 feet 7 inches along Bayshore Boulevard (340 feet along the parking garage and 457 feet 7 inches along the store and garden center). The proposed project would be 784 feet along Loomis Street (340 feet along the parking garage and 444 feet along the store and loading area, and 317 feet 8 inches along Waterloo Street (parking garage) and along the northern property line (garden center and loading area).

As stated on page 41 of the DEIR, the project site is zoned M-1 and is in a 65-J height and bulk district, which means that the maximum allowable height of a building is 65 feet (excluding elevator and mechanical penthouses)² and at heights above 40 feet in height, the maximum plan dimensions are 250 feet in length and 300 feet diagonally. The proposed project would not be subject to the 65-J height and bulk limitations since the average height of the building would be under 40 feet. The proposed dimensions of the store and parking garage would comply with the 65-J height and bulk district.

The project is proposed in an industrial zone where buildings generally have full lot coverage with occasional parking areas. No setback is required as 65-J height and bulk districts do not require setbacks at heights at or below 40 feet in height. The proposed project would conform to the *Planning Code* and no variance is necessary. As shown in Figures 2 through 6, pages 28 to 32 in the DEIR, the project would have sidewalk landscaping and street trees around the perimeter, as well as trees and landscaping on the parking garage roof, and rooftop trellis. As discussed in the Initial Study on page A-12 of the DEIR, the proposed store and parking garage would change the visual character of the site, which is in an area of primarily industrial and commercial buildings. The proposed buildings would be less than 40 feet in height; however, they would be the largest in bulk along Bayshore Boulevard in the surrounding area. The proposed buildings would be similar in height to most other buildings

² Planning Code Section 260 (b)(1)(A) exempts from the height restriction mechanical equipment and appurtenances necessary to the operation or maintenance of the building above 65 feet.

in the immediate project area. For these reasons, as noted in the Initial Study, the proposed project would not have a substantial, demonstrable negative aesthetic effect within its urban commercial and light industrial setting.

Comment #11

"Page 2 [of the DEIR]: Information on the height of the building(s) is too vague. The statement that 'The buildings would be approximately 40 feet in height' does not provide enough information to determine whether the bulk restrictions in the J Bulk District would be since the length exceeds 250 feet, or the diagonal dimension exceeds 300 feet. The lack of information on relationship of the 'attached' parking structure (three levels of parking but height unspecified) to the other buildings makes questions about zoning compliance more compelling." (*Eve Bach, Arc Ecology Consultant; Barbara Kyle, Resident/No Depot Committee Chair; and Ron Morgan, Bernal Heights Neighborhood Center Community Organizing Coordinator*)

Response #11

The heights of the buildings are shown in Figure 6 on page 32 of the DEIR. The top of the store would be 34 feet above the curb of Bayshore Boulevard, and the top of the parking garage would be 38 feet 6 inches above the curb of Bayshore Boulevard.³ As indicated in the above response, the building would have certain features above 40 feet that would be exempt from the height restrictions. These features could include elevator penthouses, parapet walls, light standards, ventilators, plumbing vent stacks, cooling towers, water tanks, together with visual screening for any such features. At a maximum height of 56.5 feet as indicated in Figure 6, page 32 of the DEIR, these items would be lower than the 65-foot height limit.

As noted in Response to Comment #10, the proposed project would conform to the City *Planning Code* height and bulk restrictions. The proposed project would be less than 40 feet in height, therefore, the maximum plan dimensions for a 65-J height and bulk district would not apply.

OBJECTIVES

Comment #12

"The only objectives included in the DEIR are those of the project sponsor. A careful reading of CEQA's purposes in requiring a Statement of Objectives¹ makes it clear that the EIR must include a

³ Planning Code Section 102.12 indicates that the height measurement of a building shall be taken at the centerline of the building where the lot is level at curb level.

statement of the lead agency's objectives in considering approval of the project. The *CEQA Guidelines* explain that a major function of the Project Objectives is to provide the agency with the basis for developing and evaluating project alternatives, and for determining whether there are considerations that override unmitigable impacts.

"The DEIR cannot properly evaluate alternatives because it has not articulated the objectives guiding the approvals process. Relying on the sponsor's objectives has reduced the evaluation of alternatives to a tautological exercise with a predictable but meaningless outcome. The evaluation of alternatives (pages 115-127) consists of comparing all the alternatives to a single objective of the sponsor: to develop a "standard-size Home Depot improvement store." Setting aside the problem that the DEIR does not define a "standard-size" store, it is clear that Alternatives A-D could have been rejected on that basis the moment they were proposed, without any further analysis, based simply on their size. The substitution of the sponsor's objectives for the City's – in particular, the objective for a "standard-sized" Home Depot – makes a mockery of the evaluation of alternatives.

"Although certification of the EIR is a separate decision, it appears that the Planning Commission and all of the other agencies that may provide project approvals will be required to make Findings of Overriding Considerations² since all of the alternatives considered in this EIR have unmitigable impacts. Given the controversy over the merits of the project, the Planning Commission should ensure that there is adequate opportunity for the public to voice their views on the content of such Findings. As the officials responsible for determining whether this project has value that overrides its unmitigable environmental impacts, the Planning Commission needs to provide themselves and the public with adequate time to review proposed findings carefully to determine if they are factually accurate and reflective of their values.

"Any finding of overriding considerations would similarly be invalidated by reference only to the sponsor's objectives. The City must determine for each of its discretionary approvals whether the project achieves public objectives that outweigh the impacts of the project on the public. It is unacceptable to approve a project with insoluble environmental problems that the public must bear simply because that project best satisfies the goals of the applicant.

"In his 11/20/02 memo,³ the EIR consultant Stu During specifically points out to Tammy Chan of the Planning Department that the objectives stated in the DEIR are those of the project sponsor, not of the City's. In the memo, he gives his interpretation of CEQA that 'the objectives are really the project sponsor's, and by definition will usually be very biased and subjective.' The mere fact that the EIR consultant (During) felt it necessary to explain his interpretation to the City and defend the bias of the objectives suggests that it is an anomalous reading of the statute.

"Page 25 [of the DEIR]: The objectives for the project should be the City's, not the sponsor's." (*Eve Bach, Arc Ecology Consultant; Barbara Kyle, Resident/No Depot Committee Chair; and Ron Morgan, Bernal Heights Neighborhood Center Community Organizing Coordinator*)

¹ CEQA *Guidelines* Section 15124.

² Section 15093.

³ Memorandum from Stu During of During Associates to Tammy Chan, Planning Department, November 20, 2002.

"[Page 25 of the DEIR]: Objective 4 - are the 'goods and services' not available in San Francisco, or are the 'competitive prices' not available in San Francisco?"

Objective 8 - why only meeting goal of Redevelopment Plan in process and not also Planning Department's proposed plan and rezoning of this industrial site?" (*Sue C. Hestor, Attorney at Law, on behalf of Cole Hardware*)

Response #12

Under CEQA, project objectives are generally those of the project sponsor. Specifically, CEQA *Guidelines* Section 15124(b) requires that an EIR contains *"a statement of the objectives sought by the proposed project. A clearly written statement of objectives will help the lead agency develop a reasonable range of alternatives to evaluate in the EIR and will aid the decision makers in preparing findings or a statement of overriding considerations, if necessary. The statement of objectives should include the underlying purpose of the project."* CEQA does not mandate that the objectives be those of the lead agency, although the feasibility of alternatives and mitigation measures is determined by the lead agency.

The range of alternatives to be examined in an EIR, as discussed in Section 15126.6(c) of the CEQA *Guidelines*, *"shall include those [potential alternatives] that could feasibly accomplish most of the basic objectives of the project and could avoid or substantially lessen one or more of the significant effects."* Alternatives must be able to implement most of the basic project objectives, but they need not be able to implement all of them.

An EIR is required to evaluate alternatives that could eliminate or reduce significant environmental impacts even if they would impede attainment of project objectives to some degree or would be more costly (CEQA *Guidelines*, Section 15126.6(b)). The proposed project's basic objective is to develop a home improvement store. The only alternatives that could reduce the environmental impacts of a home improvement store are variations in size, configuration, or location. All of these issues are explored in the Alternatives chapter of the DEIR. The DEIR addresses the ability of each alternative to meet the project objectives; the reason the objective of constructing a "standard-sized" store is specifically discussed in certain alternatives is because the objective is not met by those alternatives, not because the evaluation of alternatives has been or should be reduced to that one objective. For a discussion of "standard-sized" stores, see Response to Comment #13.

The commenter is correct that the overriding considerations are based on the project's overriding merits, not its environmental impacts. CEQA requires that the decision-making

body balance the project's "economic, legal, social, technological, or other benefits" against its "unavoidable environmental risks" (CEQA *Guidelines*, Section 15093(a)). These findings of overriding considerations must be "based on the final EIR and/or other information in the record" (CEQA *Guidelines*, Section 15093(b)). CEQA does not require that the findings of overriding consideration specifically mimic the project objectives. In many cases, the project's public benefits could coincide with, or be informed by, its objectives, but they are derived separately.

The referenced memo is consistent with CEQA *Guidelines*, Section 15124 (b).

One of the project sponsor's objectives listed on page 25 in the DEIR is "to comply with the objectives of the *General Plan*, the *City Planning Code* and all applicable codes and ordinances of the City and County of San Francisco." Current plans and planning efforts that include the project site and surrounding area are discussed in the DEIR on page 42, the Initial Study page A-11, and in Response to Comment #30. All plans under consideration by the San Francisco Planning Department and Redevelopment Agency call for commercial uses for the proposed project site. It is unclear what other specific proposed plan and rezoning the commenter references.

The project sponsor believes that, at present, there is no store in San Francisco that offers the wide range of home improvement goods and services and at competitive prices that Home Depot could offer. Thus, that is one of the sponsor's objectives stated on page 25 in the Draft EIR

The project sponsor's objective to meet the goals of the San Francisco Redevelopment Agency relates to the fact that the proposed project is within the Agency's Bayview Hunters Point Redevelopment Survey Area. As noted in Responses #30 and #31, the project would conform to the existing *Planning Code* and would be a permitted use under the Planning Department's and the San Francisco Redevelopment Agency's proposed plans for the area.

Comment #13

"The project sponsor's objective [on page 25 of the DEIR] of a 'standard-sized' Home Depot home improvement store is never defined. Although the DEIR states that the project sponsor would like to

develop a garden center of approximately 8,500 sq.ft., and a greenhouse of approximately 10,000 square feet, no size is specified for a standard-sized store, or whether the full-service lumber department is part of the store or an additional outdoor area.

"A review of recently approved Home Depot stores throughout the country shows that the company is prepared to build stores in a variety of sizes – virtually all of them smaller than the San Francisco proposal. [Refer to Attachment #2, Eve Bach, Barbara Kyle and Ron Morgan Letter dated July 24, 2003.] In a recent sample of newspaper articles about Home Depot openings or permit approvals, we found the size of the stores ranged from 60,000 to 137,000 square feet, and garden centers ranged from 1,900 to 3,300 square feet. The proposed project, at 153,089 square feet with garden center and greenhouse of 18,434 square feet is clearly a larger project than those we have found in an internet search.

"According to Home Depot's 2002 Annual Report, 'The Home Depot, Inc. and subsidiaries (the 'Company') operate Home Depot stores, which are full-service, warehouse-style stores averaging approximately 108,000 square feet in size.'¹

"The sponsor's implied claim that a store of 153,089 square feet is the standard size, when it is clearly one of the largest, if not the largest that the company has recently built, suggests that Alternative E is the actual project seeking approval and is not a compromise that would be reluctantly agreed to." (*Eve Bach, Arc Ecology Consultant; Barbara Kyle, Resident/No Depot Committee Chair; and Ron Morgan, Bernal Heights Neighborhood Center Community Organizing Coordinator*)

¹ The Home Depot, Inc., 2002, *Annual Report*, page 31.

"Page 25 [of the DEIR:] Why does sponsor's objectives to construct 'standard-sized' Home Depot limit the analysis of a smaller Home Depot? In my 4/8/02 scoping comments [Refer to Appendix E of this document, Sue C. Hestor Letter dated July 10, 2003], I requested an analysis of an Urban model Home Depot, one which is approximately 50,000 square feet and is tailored to the urban market. Home Depot is constructing such stores in other large cities. Such a smaller Home Depot is not analyzed. To the contrary, based on testimony at today's hearing, Home Depot has instead determined to build one of its largest stores on this congested, non-suburban site. Define 'standard-sized' – including amount of parking.

"Commercial uses 'similar to those previously operated on the site' is a stretch. Home Depot is one of the largest retail companies in the country. It does national TV advertising on such venues as the Superbowl. No store previously on that site did that kind of advertising, nor had the ability to undercut and thereby demolish its competitors. Whole Earth had clothing, shoes, books, and soft goods, as well as a range of appliances, TVs, stereos, cameras, and similar goods." (*Sue C. Hestor, Attorney at Law, on behalf of Cole Hardware*)

"Project objectives include construction of a 'standard size Home Depot home improvement store' but no size is specified. How big is the 'standard size'? What does a standard size store include? What proportion of Home Depot stores do not meet the standard? How many stores have received permits in the last year that are smaller than the standard size?" (*Ron Morgan, Bernal Heights Neighborhood Center Community Organizing Coordinator*)

Response #13

According to the project sponsor, the square footage of a "standard-sized" store is dependent on the sales volumes that the store would be expected to generate. Therefore, "standard-sized" buildings and garden centers vary in size depending on specific levels of expected sales volumes. According to the project sponsor, a "standard-sized" store for sales volumes equivalent to those expected for the current proposed project is an approximately 115,000 sq.-ft. building with a 35,000 sq.-ft. garden center, totaling 150,000 sq.ft. Home Depot also has a "standard-sized" store for markets with a smaller sales volume than those expected of the project (and in markets with lower real property transactional costs than what exists in San Francisco). That smaller prototype is an approximately 102,000 sq.-ft. building with a 35,000 sq.-ft. garden center, totaling about 137,000 sq.ft. For either prototype (as with the proposed project), the full-service lumber department is contained within the building envelope, and is not a separate outdoor area. Alternative E analyzed in the DEIR (pages 125-127) is approximately 140,000 sq.ft., roughly the same as the smaller prototype Home Depot. As noted in Response #10 and in the DEIR on page 25, the proposed project is larger than Alternative E, at over 150,000 sq.ft., and as noted in Response #12, the lead agency would determine the feasibility of each alternative.

The proposed project would consist of a 134,655 sq.-ft. building, a 9,888 sq.-ft., enclosed greenhouse, and a 8,546 sq.-ft. garden center, totaling approximately 153,089 sq.ft. There is slightly more building space and slightly less garden center space than in a prototypical "standard-sized" store for the applicable sales volume, since the store would serve an urban population with relatively less demand for garden products. In addition, unlike most Home Depot stores, in order to fit the size of the San Francisco site and meet market demand, the project would be designed as a two-level building, which would result in certain inefficiencies of space requiring additional square footage.

The commenter's table [refer to Attachment 2, Eve Bach, Barbara Kyle, and Ron Morgan Letter dated July 24, 2003, page E-24] showing varying store square footages lacks details such as sales volumes and site constraints, which affect decisions regarding store size, therefore, a comparison between these stores and the proposed project is difficult. Even without such details, four of the stores listed (Pasco County, Florida; Dublin, Georgia; Lakeland, Florida; and Clackamas, Oregon) measure approximately 130,500 to 158,300 sq.ft.

in size (including garden center); these are similar to or slightly larger than the project's proposed 153,089 sq.ft.⁴ In addition, the table lists a Home Depot store in Sonora, California. No Home Depot currently exists or is proposed in that location. Table C&R.1 on the following page is a list of 36 Home Depot stores in the San Francisco Bay Area and their square footages.

As noted in Table C&R.1, Home Depot stores come in a variety of sizes. The variety of sizes is based on factors such as site constraints, projected sales volume, and land costs.

The DEIR on pages 121 to 123, in fact, analyzes a smaller-sized store as part of its examination of alternatives. Alternative C is a 60,000 sq.-ft. project that would have fewer environmental impacts than the proposed project; however, the analysis discusses the fact that Home Depot has found that stores of this size are not usually successful unless they carry an abbreviated range of products and services and are located close to a full-size Home Depot (within 5 miles). The Home Depot in Colma, located approximately seven miles from the project site, is not close enough to rely on for support services. Alternative C therefore does not meet the basic objectives of the project, identified on page 25 in the DEIR, which include "to provide a wider range of home improvement goods and services and at competitive prices not otherwise available within the City and County of San Francisco," and "to satisfy a home improvement market need for both do-it-yourself customers and local contractors in San Francisco and the surrounding area." A proposed store similar in size to the Colma store is proposed in Daly City (scheduled to open in 2006), which would be approximately six miles from the project site, again not close enough to rely on for support services.

⁴ Home Depot confirmed the following information:

Clackamas, OR. Building, 103,906 sf, Garden Center, 19,068 sf, Outdoor Lumber Area, 35,332 sf, Total sf = 158,306

Dublin, GA. Building, 102,513 sf, Garden Center, 27,988 sf, Total = 130,501 sf (no separate lumber area)

Lakeland, FL. Building 108,360 sf, Garden Center, 25,009 sf, Total = 133,369 sf (no separate lumber area)

There are several stores in Pasco County. The commenter's reference did not identify a specific store.

Table C&R.1
Square Footages and Number of Parking Spaces of Home Depot Stores in the Bay Area

Store Location	Customer Parking Provided [†]	Open Date	Building (sf)	Garden Center (sf)	Total (sf)
Campbell	443	1/7/1993	102,332	18,705	121,037
Colma	435	10/19/1995	99,940	13,196	113,136
Colma - Supply Store	337	4/30/1998	80,750	8,198	88,948
Concord	466	5/2/1991	102,220	20,220	122,440
Daly City	n/a	*	99,970	10,236	110,206
East Palo Alto	441	7/22/1999	107,700	24,102	131,802
El Cerrito	548	6/17/1993	100,000	29,590	129,590
Emeryville	468	7/14/1994	102,496	28,143	130,639
Fremont	464	2/22/2001	107,920	23,841	131,761
Gilroy	477	10/28/1999	105,700	24,102	129,802
Hayward	500	11/15/2001	107,920	23,298	131,218
Hercules	461	12/11/2003	94,984	24,301	119,285
Livermore	473	1/6/2000	107,784	23,920	131,704
Milpitas	490	6/21/2001	108,994	23,928	132,922
Milpitas - Supply Store	382	5/16/2002	83,199	14,964	98,163
Morgan Hill	415	4/29/2004	103,359	19,250	122,609
Napa	338	1/21/1999	100,238	19,870	120,108
Oakland	649	6/24/2004	122,050	36,145	158,195
Pittsburg	471	8/5/1993	100,670	22,053	122,723
Pleasanton	463	12/13/1990	102,242	26,722	128,964
Rohnert Park	567	7/23/1992	104,470	40,000	144,470
Salinas	494	10/28/1993	102,180	28,336	130,516
San Carlos	369	10/12/1989	102,220	27,918	130,138
San Jose / Blossom Hill	386	4/17/1986	98,833	3,871	102,704
San Jose / Bollinger	457	5/11/2000	106,344	24,644	130,988
San Jose / Hillsdale	494	3/7/2002	110,290	22,030	132,320
San Leandro	643	8/31/1988	138,272	9,399	147,671
San Mateo	488	12/4/1997	105,700	22,984	128,684
San Rafael	527	8/22/1996	102,190	28,143	130,333
San Ramon	488	1/11/1996	103,019	26,594	129,613
Santa Clara	488	12/13/1990	95,700	15,120	110,820
Sunnyvale	487	10/15/1992	131,200	25,960	157,160
Union City	442	3/12/1992	102,340	25,902	128,242
Vallejo	493	1/16/1992	104,080	19,920	124,000
Watsonville	457	10/28/2004	94,981	24,000	118,981
Windsor	465	6/28/2001	107,920	23,920	131,840

Source: Home Depot

[†] In many cases, the store is part of an overall shopping center, thus the number given indicates how many spaces are available specifically for Home Depot customers.

* Project has been approved and construction is about to begin.

sf = square footage

n/a = information not available

One objective of the proposed project is to reuse an existing site with commercial uses similar to those previously operated at the site. The previous uses on the site were the 76,846 sq.-ft. Goodman Lumber Company store and the approximately 30,500 sq.-ft. Whole Earth Access store. The proposed Home Depot store would carry the complete inventory previously available in the Goodman Lumber Company store. In addition, the Home Depot store would also sell home appliances and light fixtures that were available at the Whole Earth Access store.

PROJECT APPROVALS

Comment #14

"The EIR needs to itemize the Planning Commission approvals requested by the applicant that will be based on this EIR.¹ The description on page 2 of the Planning Commission approvals ('Planning Department staff-initiated discretionary review before the Planning Commission') is surprisingly vague. The description of project approval requirements on pages 33 and 34 suggest that the Planning Commission's role is limited to certification of the EIR. The text states that the City is required to find that the proposed project or legislation is consistent with the [Prop M] Priority Policies, but is unclear who in the City makes this determination. The listing of approvals needed from the Department of Public Works, the Department of Building Inspections, and Department of Parking and Traffic, and the Board of Supervisors at least give some idea of what specific approvals would be needed. Our questions to the Planning Department contact for this project were answered² with a referral to someone else in the Department rather than an answer." (*Eve Bach, Arc Ecology Consultant; Barbara Kyle, Resident/No Depot Committee Chair; and Ron Morgan, Bernal Heights Neighborhood Center Community Organizing Coordinator*)

¹ The description of the project must include "A list of permits and other approvals required to implement the Project" (Section 15124(d)(1)(B)).

² Email from Tammy Chan to Ron Morgan, 6/27/03.

"Nature of the Project. We all know that Bayshore needs to be developed. The Planning Commission needs to consider Proposition M. Home Depot will put other local hardware stores out of business. Many jobs will also be lost from these local businesses. Bayshore is full of great hardware resources." (*Amy C. Miller and Virginia Bowen, Residents*)

"Also, could you outline the governing standards or requirements for each approval that the project needs in order to go forward?

"1. Public Works - curb cuts (what standards govern/guide approvals?).

"2. Building Inspection - demolition and building permits (are these considered discretionary because of Prop M?).

"3. Parking and Traffic, Interdepartmental Staff Committee on Traffic and Transportation - approval of new signals, crosswalks, left-turn pockets, change to median (what standards govern/guide approvals? Are these decisions subject to appeal?).

"4. Board of Supervisors - left-turn pocket, changes to median (what standards and findings are required?).

"5. Planning Commission - What specific approvals will they be asked to give, what are the required findings, and which can be appealed? (Certification of EIR? Use Permit? Consistency with Prop M Priority Policies?)" *(Ron Morgan, Bernal Heights Neighborhood Center Community Organizing Coordinator)*

Response #14

The project sponsor has submitted a site permit to allow demolition of the existing structures on site and construction of the proposed project. As noted in the Draft EIR on pages 2, 33, and 34, the proposed project would be a principally permitted use and would not require special authorization by the Planning Commission. The project sponsor and the Planning Department, however, have agreed to submit the project to the Planning Commission for a public hearing under discretionary review. Thus, a staff-initiated discretionary review hearing before the Planning Commission would allow the public to comment on the merits of the project. The discretionary review hearing and potential approval actions are separate from the EIR certification hearing; however, the actions may be considered at a single Planning Commission hearing. The public would be notified of the public Planning Commission hearing for EIR certification and discretionary review. All commenters on the Draft EIR would be notified by mail of the certification hearing and the Planning Commission agenda is posted on the City government web site.

As noted in the Draft EIR on page 34, prior to issuing a permit for any project; prior to issuing a permit for any demolition, conversion, or change of use; and prior to taking any action which requires a finding of consistency with the *General Plan*, the City (in this case the Planning Commission) is required to find that the proposed project is consistent with the eight Priority Policies established under Proposition M, the Accountable Planning Initiative (*Planning Code* Section 101.1). The case report's approval motions for the proposed project would contain the analysis determining the project's consistency with the Priority Policies. This would be part of the discretionary review hearing, where the Planning Commission will determine whether to approve the site permit for the proposed project.

In addition, if the project as proposed (or any of the alternatives discussed in the EIR) were approved by the Planning Commission, the Planning Commission would need to adopt findings for each identified significant effect (CEQA Section 15091), and issue a Statement of Overriding Considerations. (Also see Response to Comment #12.)

The public would have an opportunity to review the proposed findings and the Statement of Overriding Consideration, and would be able to address the Planning Commission on these matters when the project is considered for approval. The Planning Commission's certification of the EIR could be appealed to the Board of Supervisors. The Planning Commission's action on the site permit is subject to discretionary review and would not be appealable.

In addition, following completion and certification of the Final EIR, and Planning Commission approval of the site permit, the project would require the following approvals:

- Department of Public Works approval for curb cuts on Bayshore Boulevard and Loomis Street.
- Department of Building Inspection issuance of demolition and building permits. These are subject to appeal to the Board of Permit Appeal.
- San Francisco Department of Parking and Traffic (DPT) and the Interdepartmental Staff Committee on Traffic and Transportation (ISCOTT) approval for the installation of new traffic signals and pedestrian crosswalks at Bayshore Boulevard and Cortland Avenue, the creation and extension of northbound and southbound left-turn pockets on Bayshore Boulevard, and changes to the median on Bayshore Boulevard. These decisions are appealable administratively to the Director of Department of Parking and Traffic and then to the Board of Supervisors.
- Board of Supervisors approval of the southbound Bayshore left-turn pocket and changes to the median on Bayshore Boulevard.

Comment #15

"[I] would like to see [the] Community Commitment document included in the DEIR" (*Shelly Bradford Bell, Planning Commission President*)

"The negative effect of the project greatly outweighs its benefits. The DEIR concedes that the negative impacts of certain air pollution cannot be reduced to an insignificant level (DEIR at [page] 113). However, no negative effects of any air pollution can be mitigated, because once pollutants are released into the air, they cannot be captured and they then add to the already polluted air. Because the significant impacts of increased air pollution cannot be mitigated, the San Francisco Planning

Department must adopt a Statement of Overriding Considerations, which finds that overriding "benefits of the project outweigh the significant effect on the environment."¹

"The potential benefits of this project are dubious at best, considering that Home Depot pays low wages and does not allow its workers to unionize, which would bring them higher wages and benefits. Home Depot has also failed to guarantee that a certain number of residents from the Bayview community will be hired, so that there may be no benefit to either community from this project. This small potential benefit of a few possible low-paying jobs clearly does not outweigh the significant negative effects of all of them together. Considering that the substantial amount of additional air pollution and noise that will be generated by the project cannot be mitigated and that there will be an additional adverse impact to pedestrians, the significant effects on the environment clearly outweigh the small and merely potential benefits of the project. There is thus no way that you can honestly and logically adopt a Statement of Overriding Considerations, which is needed to approve the project due to its unmitigable effects." (*Jeff Hoffman, Resident*)

¹ Public Resources Code Section 21081(a)(3), (b).

Response #15

The second commenter is correct in observing that if the Planning Commission were to approve the project, in accordance with CEQA, it would need to adopt findings for each identified potential significant adverse environmental effect, and it would need to adopt a Statement of Overriding Considerations. Traffic and air quality are unmitigable impacts, however, pedestrian and noise impacts were found not to be significant and hence do not warrant mitigation measures. The Commission is required to balance, as applicable, the economic, legal, social, technological, or other benefits of a proposed project against its unavoidable environmental risks when determining whether to approve the project.

The project sponsor has entered into a First Source hiring agreement with the City regarding store operations (see Appendix G of this document, pages G-4 and G-5). Chapter 83 of the *San Francisco Administrative Code* ("First Source Hiring Program") requires project sponsors to identify entry level positions for qualified economically disadvantaged individuals, and to set appropriate recruitment, hiring and retention goals.

The First Source hiring agreement for the proposed project sets forth a jobs training and hiring program that calls for the project sponsor to use good faith efforts to fill (a) at least 100 (approximately 50 percent) of the new entry-level retail positions at the proposed store with residents of the Bayview Hunters Point area, and (b) at least 50 (approximately 25 percent) of the new entry-level retail positions with residents of the Potrero Hill, Visitacion Valley, Bernal Heights, Excelsior and Mission neighborhoods. In addition, the project sponsor

would take measures to recruit, screen, and train candidates from the targeted areas to work in retail jobs at the store.

The project sponsor has also entered into a First Source hiring agreement with the City regarding construction jobs. Under that agreement, the project sponsor and its contractor must use good faith efforts to ensure that at least 50 percent of the person-hours spent to construct the store are performed by residents of the City of San Francisco, with at least half of that (25 percent of the total person-hours) being performed by residents of the Bayview Hunters Point area.

The commenter may present his position before the Planning Commission regarding the benefits of the project when the Commission considers the project for approval or denial (also see Response to Comment #157 related to Home Depot employment practices).

The Commissioner's request regarding the "Community Commitment" document presumably refers to an agreement that the project sponsor has made with The Bayview Hunters Point Project Area Committee (BVHP-PAC) concerning Home Depot's hiring commitments and other community benefits. The Commitments document has been included in this Final EIR as Appendix G.

Comment #16

"There is a possible appeal of the EIR to the Board of Supervisors. Will the Commission act before that appeal is considered?" (*Sue C. Hestor, Attorney at Law, on behalf of Cole Hardware*)

Response #16

Under the provisions set forth in Chapter 31 of the *City Administrative Code*, Section 31.16, the EIR must be certified by the Planning Commission before it may be appealed to the Board of Supervisors. Specifically, Section 31.16 states, "*Any person or entity that has submitted comments to the Planning Commission or the Environmental Review Officer on a Draft EIR, either in writing during the public review period, or orally or in writing at a public hearing on the EIR, may appeal the Planning Commission's certification of a final EIR to the Board of Supervisors.*"

VII. COMMENTS AND RESPONSES

PROJECT DESCRIPTION

A letter of appeal must be submitted to the Clerk of the Board within twenty (20) calendar days after the Planning Commission's certification of the EIR.

The Planning Commission may consider project approval at the same hearing that it considers certification of an EIR.

LAND USE, GENERAL PLAN COMPLIANCE, AND ZONING

LAND USE

Comment #17

"Page 3 [of the DEIR]: The description of uses in the surrounding area is incomplete. The description of nearby buildings omits mention of residential buildings and a child care center." (*Eve Bach, Arc Ecology Consultant; Barbara Kyle, Resident/No Depot Committee Chair; and Ron Morgan, Bernal Heights Neighborhood Center Community Organizing Coordinator*)

Response #17

The page referenced by the commenter is in the Summary chapter of the EIR. A more complete description of the project area is found on page 37. The DEIR notes that the nearest residential development is west of Bayshore Boulevard and west of U.S. 101 in the Bernal Heights neighborhood, less than 400 feet from the project site. There are also residential units north of I-280 and west of U.S. 101 on a small hill south of Industrial Street, approximately 1,500 feet south the project site. The child care center referenced by the commenter is the Big City Montessori School located at 240 Industrial Street at the northeast corner of Loomis Street, about 300 feet south of the project site. It is identified on page 82 of the DEIR.

The following sentence is added at the beginning of the third paragraph on page 37 of the DEIR: "A child care center, the Big City Montessori School, is located about 300 feet south of the proposed project at the northeast corner of Loomis Street and Industrial Street." This additional sentence does not affect the conclusions of the DEIR in terms of land use or any other impacts.

Comment #18

"Page 4: The DEIR erroneously states that the project will not change the area. The statement that 'The proposed project, however, would not essentially change the existing retail/light industrial character or physical arrangement of the area' is incorrect. Improvements that have been incorporated into the project will change the physical configuration of Bayshore Boulevard by changing the dimensions of the center divide. It is also likely that this project will open the door to other 'big box' retail establishments that do not now exist in the area, a factor indirectly

acknowledged in the DEIR's brief discussion of inducements to commercial growth in the area on page 103." (*Eve Bach, Arc Ecology Consultant; Barbara Kyle, Resident/No Depot Committee Chair; and Ron Morgan, Bernal Heights Neighborhood Center Community Organizing Coordinator*)

Response #18

The statement referenced by the commenter is in the Summary chapter of the EIR. A more comprehensive discussion of land use is found on pages 35 to 40 in the DEIR. The discussion states that the proposed project would be a large development containing some of the previous uses on the site, and would increase the density of uses, number of customers and amount of vehicles on the site. The proposed project, however, would not essentially change the existing retail/light industrial character or physical arrangement of the area. The use would be generally compatible with the mix of surrounding commercial and industrial uses in a dense urban area. As noted on page A-13 in Appendix A of the DEIR, the proposed project would not result in significant adverse land use impacts.

The proposed project would intensify the use of the site and may induce commercial growth, however, the project would not provide new infrastructure that could be used to serve other projects, nor would it extend infrastructure into a new area. The project would not have a significant growth-inducing impact (see the Growth Inducement section of this document, page C&R.298 and the DEIR on page 103).

In the context of land use changes envisioned by CEQA, a change in the physical arrangement of an area would entail new streets, major expansion of streets, grade separations or bridges over streets, closure or abandonment of a street, and zoning changes to allow larger, denser structures. The transportation improvements to the Bayshore Boulevard proposed as part of the project would include new traffic signals, countdown pedestrian lights and pedestrian crosswalks at Bayshore Boulevard and Cortland Avenue, a left-turn pocket for southbound Bayshore Boulevard traffic to enter the project site, an extension of the northbound Bayshore Boulevard left-turn lane; and north of the project site, the median on Bayshore Boulevard would be changed to allow northbound traffic to make U-turns. These transportation improvements would be minor in the context of changes to land use and would not constitute a change in the physical arrangement of the community.

Comment #19

"Pages 35 and 37 [of the DEIR:] Is the building supply company south of Waterloo in fact closed? It does not appear to be. The store across Bayshore, north of Cortland, is called 'Floorcraft.'" (*Sue C. Hestor, Attorney at Law, on behalf of Cole Hardware*)

Response #19

The commenter is correct. The building supply company south of Waterloo Street, Bayshore Building Supply, is occupied, and the store across Bayshore Boulevard, north of Cortland Avenue, is called "Floorcraft."

In the DEIR on page 37, third paragraph, line five, the sentence is revised to read: "A vacant building supply warehouse is located to the south, across Waterloo Street."

Comment #20

"Another potential land use impact is whether, based on the report on cultural resources, the site must be used for Public Trust purposes."¹ (*Eve Bach, Arc Ecology Consultant; Barbara Kyle, Resident/No Depot Committee Chair; and Ron Morgan, Bernal Heights Neighborhood Center Community Organizing Coordinator*)

¹ Allen Pastron, "Archival Cultural Resources Evaluation of the Proposed 491 Bayshore Boulevard/196 Loomis Street Home Depot Project," May 2002, pages 13, 16, 25, 27-37.

Response #20

Under the public trust doctrine, lands below ordinary high water or mean high tide are held in trust for the people of California and can only be used in furtherance of navigation, commerce, fisheries and other trust-related purposes. As noted in the DEIR section under Cultural Resources on pages 101 and 102, in its natural state, the project site was situated on relatively level ground at elevations ranging between 0 and 10 feet above mean sea level. Based on a review of various historical maps, the project site and its immediate locale were situated amidst the salt marshes surrounding Islais Creek on the interface of the wet and dry environmental zones. The marshy tract that characterized much of the Islais Creek neighborhood was transformed into buildable land by the first half of the 20th Century.

The California State Lands Commission noted that the proposed project site is not eligible for the Public Trust.⁵

The DEIR indicates on page 102 that the project site should be deemed a zone of high prehistoric/protohistoric archeological sensitivity, and recommends that a systematic program of pre-construction archeological testing and evaluation be implemented. The revised Mitigation Measure for Archeological Cultural Resources (see below) states that if an archeological resource were discovered, it would be evaluated and a number of measures could be implemented that might include: preservation in situ of the archeological resource; an archeological monitoring program; or an archeological testing program. Regardless of the action, the project site would not be eligible for public trust purposes.

The Planning Department has revised the standard Archeological Cultural Resources Mitigation Measure, and the new mitigation measure recommended for the project site is found in Section E – Staff-Initiated Text Changes and Errata, pages C&R.365 through C&R.368. Home Depot has agreed to implement this revised measure.

Comment #21

"Page 41 [of the DEIR:] The conclusion in the Land Use Analysis that the buildings will be less than 40 feet is different from the Project Description that equivocates, stating only that the buildings will be approximately 40 feet." (*Eve Bach, Arc Ecology Consultant; Barbara Kyle, Resident/No Depot Committee Chair; and Ron Morgan, Bernal Heights Neighborhood Center Community Organizing Coordinator*)

Response #21

As noted in Response to Comment #11, the height of the proposed store would be approximately 34 feet and the height of the proposed parking garage would be 38 feet 6 inches, as measured from the curb to the top of the roof along Bayshore Boulevard.

Comment #22

"Page 40 [of the DEIR:] Those facilities [prior land uses on the project site] at most had regional SF Bay advertising, nearly all of it in local and neighborhood-oriented newspapers. Home Depot is a

⁵ Grace M. Kato, Public Land Management Specialist, California State Lands Commission, letter to Stu During, December 30, 2003. This letter is available for public review by appointment at the San Francisco Planning Department, 1660 Mission Street, Fifth Floor, as part of Case File 2001.0062E.

national advertiser which probably spends hundreds of millions of dollars on television and other national advertising, besides massive amounts of money in regional newspapers. That level of advertising generates much more traffic from outside the immediate area of this site.

"The character of this area would change dramatically because Home Depot will be the anchor for other Big Box facilities, particularly when Planning has already designated this area for big box. There is no precedent in San Francisco or in the immediate Bay Area where a single big box facility is located in isolation from others. Costco opened, followed by the 555 9th Street center, followed by the conversion of Canned Foods to Best Buy. Sears on Masonic was converted into a series of stores, including Office Depot. The Standard Brands across Geary was converted to a Trader Joes. In both of these instances, the projects that followed the initial anchor caused substantial traffic problems. (In the case of Trader Joes, which change in use triggered no environmental evaluation, the traffic problems are so severe that there must be monitors controlling access to the site because traffic backs up seriously on Masonic.)

"Can Home Depot provide specific instances where they have gone into an area zoned industrial (or similar) as the first big box store, and where after 5 years there were no other big box or large commercial facilities within ½ mile?" (*Sue C. Hestor, Attorney at Law, on behalf of Cole Hardware*)

Response #22

The DEIR states on page 59 that an estimated 76 percent of the anticipated customers of the proposed project would come from San Francisco, with the remainder from cities to the south, including Brisbane, South San Francisco, San Mateo, Millbrae, San Bruno and Colma. As noted in Response to Comment #18, the proposed project would not essentially change the existing retail/light industrial character of the area. Primary land uses along Bayshore Boulevard would continue to be commercial retail. While the proposed project could stimulate additional retail growth in the area, the commenter's assertion that other large-scale "big box" retail projects would automatically occur in the area is speculative. The Planning Department has no other applications for other large retail projects in the area. New and expanded retail uses for the area would be subject to review by the Planning Department and potential approval by the Planning Commission, and would be subject to environmental impact analysis (e.g., for traffic and air quality impacts) under CEQA. The project sponsor has not conducted economic development studies on the change in land uses around its stores five years after opening.

Comment #23

"I think the comments have been made about Bayshore Boulevard. It always has been a home improvement area. Whether it should remain that or not is conjectural, but when I was doing things 20 years ago, I would go down there to Sid Mar for sinks, to Goodman's and Floorcraft, and those different shops. The scope may be larger here, but the usage is similar. Those are basically the things I heard tonight." (*Michael Antonini, Planning Commissioner*)

"I think that it is a poor use of our land; our extremely limited land, to devote it to a big-box. I think we can do better, and I think we owe it to the neighborhoods that surround it, and to the city." (*Amy Beinart, Resident*)

"The use of this land as yet another Home Depot chain store doesn't serve the City well. Land in San Francisco is precious; let's make sure that this is the best use of this parcel of land (I haven't seen any serious alternate proposals)." (*Michael D., Linda, Catriana, Hanh, and Michael L. Larson, Residents*)

"The other thing is simply just a planning note. Right now there are two major vacant sites on Bayshore Boulevard. There is an opportunity for development to create a sense of place on Bayshore Boulevard, and this has not been addressed by – will not be addressed by a large, big box retail outlet." (*Joseph Smook, Resident*)

Response #23

The proposed project would be a permitted use in the M-1 zoning district. The project site on Bayshore Boulevard is in an area of light industrial and commercial uses. The Planning Commission would decide whether or not the proposed project represents the best use of the site. The commenters may convey their views to the Planning Commission regarding appropriate use of the project site at the public hearing on project approval.

Comment #24

"The project in itself, and in conjunction with growth it will induce, would create a significant land use impact by changing the character of land use along Bayshore Boulevard, replacing smaller retail establishments with large regional-serving stores. Approval of the project will endanger neighborhood-serving retail and diminish opportunities for resident ownership of such businesses in both Bernal Heights and in Bayview Hunters Point. In many cities, the impact of big box development has been to cause neighborhood serving retail establishments to fail. Impairing the viability of neighborhood retail would cause physical deterioration, both in Bernal Heights and in Bayview Hunters Point, as well as a change in traffic patterns as residents would have to travel further, and by car rather than on foot, to meet day-to-day needs for goods and services." (*Eve Bach, Arc Ecology Consultant; Barbara Kyle, Resident/No Depot Committee Chair; and Ron Morgan, Bernal Heights Neighborhood Center Community Organizing Coordinator*)

"Page 34 [of the DEIR:] Priority policies include 'preservation and enhancement of neighborhood-serving retail uses,' and 'protection of neighborhood character.' Throughout the City, locally-owned neighborhood hardware, nurseries, and home improvement stores are vital parts of NC districts. What assumptions are being made about whether these stores will continue?" (*Sue C. Hestor, Attorney at Law, on behalf of Cole Hardware*)

"One of the points that was made earlier about reconciliation between the neighborhoods, and between areas: I want to emphasize this. Throughout this we have made efforts to reconcile on both a personal level and environmental level and virtually every level – economic level. We really have trouble with that, and I think the Planning Commission really needs to look at that – how we resolve

this issue, and certainly future issues of reconciliation, in future planning, and this planning, especially." (*Mark Lynch, Resident*)

Response #24

No evidence has been presented that the project would induce a change in the land uses in the area from small retail to region-serving retail, or that neighborhood-serving retail businesses would fail as a result of the project.

In order to confirm a connection between the economic effects of the project and the physical deterioration or urban decay predicted by the commenters, the following chain of events would need to be established: (i) that operation of the project would result in the failure of competing retail stores; (ii) that such failed competing retailers' space would not be reused by other occupants within a reasonable time frame; and (iii) that such long-term vacancy of the space would result in physical deterioration or urban decay. Most of the commenters' stated concerns regarding the economic and social effects associated with the proposed project are specifically related to financial impacts, and none establish with any degree of certainty that the effects of the proposed project can be traced to economic or social changes and subsequently to resulting physical impacts. Thus, no evidence has been provided by the commenters to support links (i), (ii), or (iii) above.

See Response #28 for an additional discussion of the potential economic effects of the project. See also Response #30 and Response #22 for additional discussion of land use plans and policies for the Bayshore and Bayview Hunters Point areas.

The commenters' concerns regarding the potential effects of the project on changes in land use are noted and will be considered by the decision-makers. To the extent that the economic and social effects of the proposed project could result in physical changes to the environment, such potential environmental impacts have been identified and fully analyzed in the relevant topical sections of Chapter III of the DEIR.

Comment #25

"This very large project is proposed at Cortland Avenue, the one eastern entry to Bernal Heights. This project is just over the border from our residential area. It would have a deeply negative effect upon Bernal Heights. Shouldn't there be a grey area around a residential zone that prevents such

large projects? Home Depot ought to pick from one of the other industrial sites available." (*Eugenie Marek, Resident*)

Response #25

The zoning in San Francisco frequently has light-industrial (M-1) and heavy commercial (C-M) adjacent to residential zoning (please refer to Figure C&R.9 on page C&R.31). The Planning Commission has discretionary authority to determine whether a proposed project would be compatible with adjacent land uses. The *General Plan* also provides urban design policies regarding appropriate design for commercial projects adjacent to residential projects. As shown in Figure C&R.9 on page C&R.31, Highway 101 separates a larger residential district (RH-1) from the M-1 light industrial district in which the project site is located.

GENERAL PLAN

Comment #26

"Page 35 [of the DEIR]: Land use impacts are potentially significant and must be analyzed. The conclusion that land use impacts are less than significant, as claimed by the Initial Study, is not justified. The compatibility of the project with the adjacent Bernal Heights neighborhood, cannot be ensured because Bernal Heights is not covered by General Plan Land Use policies. As a result, the General Plan does not ensure the compatibility of Bernal Heights land uses with those of adjoining areas, and Bernal Heights therefore lacks protection of its land uses from the environmental impacts, such as traffic, noise, air quality, and blocked views from new uses in adjoining areas.

"By default, the principal land use protection available to the Bernal Heights neighborhood is afforded by the priority policies instituted by Proposition M. The project would cause land use impacts because it would be inconsistent with the following priority policies in the Planning Code:

- "• That existing neighborhood-serving retail uses be preserved and enhanced and future opportunities for resident employment in and ownership of such businesses enhanced;¹
- "• That a diverse economic base be maintained by protecting our industrial and service sectors from displacement due to commercial office development, and that future opportunities for resident employment and ownership in these sectors be enhanced.²

"The proposed development raises a significant question concerning compliance with the San Francisco General Plan, since the General Plan's Land Use Indices do not pertain to Bernal Heights, and there is no Land Use element to establish reference." (*Eve Bach, Arc Ecology Consultant; Barbara Kyle, Resident/No Depot Committee Chair; and Ron Morgan, Bernal Heights Neighborhood Center Community Organizing Coordinator*)

¹ *San Francisco Planning Code* Section 101.1(b)(1).

² *San Francisco Planning Code* Section 101.1(b)(5).

"There is one problem I would like to bring to your attention, and it is a problem both with the Environmental Impact Report, and it is a much bigger problem as well. And that has to do with the inadequacy of the general plan. As you may know, San Francisco's general plan looks at most – provides most land use policies through the area plans. Bernal Heights doesn't have an area plan, and the general plan doesn't have a land use element. So we have a situation where there are no policies that cover Bernal Heights. The reconciliation of uses that ordinarily would be addressed by the land use element – direct conciliation between adjoining areas, and between areas in the city as a whole – has not taken place. This is a much bigger problem than the EIR problem, but it also is an EIR problem, because it is not mentioned in the EIR, and because the potential conflicts are not addressed, the potential land use conflicts are not addressed." (*Eve Bach, Arc Ecology Consultant*)

"As I have previously expressed to the Planning Department, neither I nor any of the other residents of the contiguous Bernal Heights area were consulted before the current planning guidelines for that area were developed, or before the Home Depot project was advanced to this stage in the planning process. I have looked at the Planning Department studies that paved the way for big-box stores on Bayshore, and noted that Bernal Heights is shown – if at all – as some sketchy terra incognita on the periphery of the Department's maps. The impact of the planned growth on the Bernal community is nowhere considered." (*Chris Witteman, Resident*)

Response #26

The *General Plan* does not have a specific area plan that covers the Bernal Heights neighborhood, nor does it have a specific Land Use Element. In neighborhoods that are not covered by a specific area plan, the *General Plan* applies. In the *General Plan*, land use policies and maps are contained in various other elements.

As noted in the introduction to the *General Plan*, San Francisco is a dynamic entity within which there are constant pressures for change and renewal. *"The City's General Plan serves to guide these changes to ensure that the qualities that make San Francisco unique are preserved and enhanced. The General Plan is based on a creative consensus concerning social, economic, and environmental issues. Adopted by the Planning Commission and approved by the Board of Supervisors, the General Plan serves as a basis for decisions that affect all aspects of our everyday lives from where we live and work to how we move about. It is both a strategic and long-term document, broad in scope and specific in nature. It is implemented by decisions that direct the allocation of public resources and that shape private development. In short, the General Plan is the embodiment of the community's vision for the future of San Francisco."*⁶

⁶ *San Francisco General Plan*, Introduction, electronic file at sfgov.org/planning/egp/index.htm, page 1.

*"State law requires that the General Plan address seven issues: land use, circulation, housing, conservation, open space, noise and safety. The Charter approved by the voters in November 1995 requires that the Planning Commission recommend amendments to the General Plan to the Board of Supervisors for approval. This approval changes the Plan's status from an advisory to a mandatory document and underscores the importance of Referrals establishing consistency with the General Plan prior to actions by the Board of Supervisors."*⁷

The *General Plan* is intended to be an *"integrated, internally consistent and compatible statement of objectives and policies and its objectives, and policies are to be construed in a manner which achieves that intent. Section 101.1(b) of the Planning Code, which was added by Proposition M, November 4, 1986."*⁸

In order to provide an easy reference to the various land use policies that are contained throughout the *General Plan*, and to relate these policies and maps to the State law requirements regarding the content of land use elements, the *General Plan* contains a Land Use Index. This Index cross references the State law requirements for a land use element with the land use policies as contained in the various elements and area plans of the *General Plan*. The project site and the Bernal Heights area are shown in a number of maps in the Land Use Index.

The Draft EIR addresses the *General Plan* and lists some objectives and policies relevant to the proposed project on pages 40 and 41 of the DEIR. These objectives and policies pertain to both the Bernal Heights and South Bayshore neighborhoods. The Planning Commission would determine the consistency of the proposed project with the *General Plan* policies.

The analysis of land use impacts does not rely solely on *General Plan* issues, but considers land use compatibility, density, and other issues. The CEQA analysis of the proposed project would not change if Bernal Heights were to have an area plan.

⁷ Ibid, page 2.

⁸ Ibid.

Although it would not relate directly to the development of the proposed project, there is a Bernal Heights Special Use District (SUD) in the *San Francisco Planning Code* (Section 242) which was created to "... *reflect the special characteristics and hillside topography of an area of the City that has a collection of older buildings situated on lots generally smaller than the lot patterns in other low-density areas of the City, and to encourage development in context and scale with the established character.*" This SUD, as shown in Figure C&R.12 on page C&R.68, encompasses most of the Bernal Heights neighborhood and sets forth zoning controls related primarily to residential design guidelines and minimal commercial development. The proposed project is not within the Bernal Heights SUD. The project site is located in the *South Bayshore Area Plan Element* of the *General Plan*, which is designated for light industrial use. The project would be consistent with the land uses of the Northern Industrial Area of the *South Bayshore Area Plan*.

Comment #27

"Page 40 and 41 under the General Plan. The DEIR lists the key objectives and policies of the General Plan relevant to the proposed project. Further discussion is necessary beyond listing the General Plan's Objective/Policy. Discussion relative to how the project is meeting these goals is necessary. The project design seems inconsistent with Urban Design element policy 2 and policy 6. DEIR should detail how the project is meeting the General Plan policies as listed. Also under the transportation element, policy 6.1, the project design as presented does not appear to designate expeditious routes for freight trucks as required by the policy. The lack of adequate crossings fails to provide adequate crossings as mentioned in policy 23.7. The truck entry provided in the project design does not adequately serve the 30 daily truck deliveries anticipated by the project, and therefore does not meet policy 40.1. Further discussion of how the project will meet the policies of the General Plan is necessary." (*Shelley Bradford Bell, Planning Commission President*)

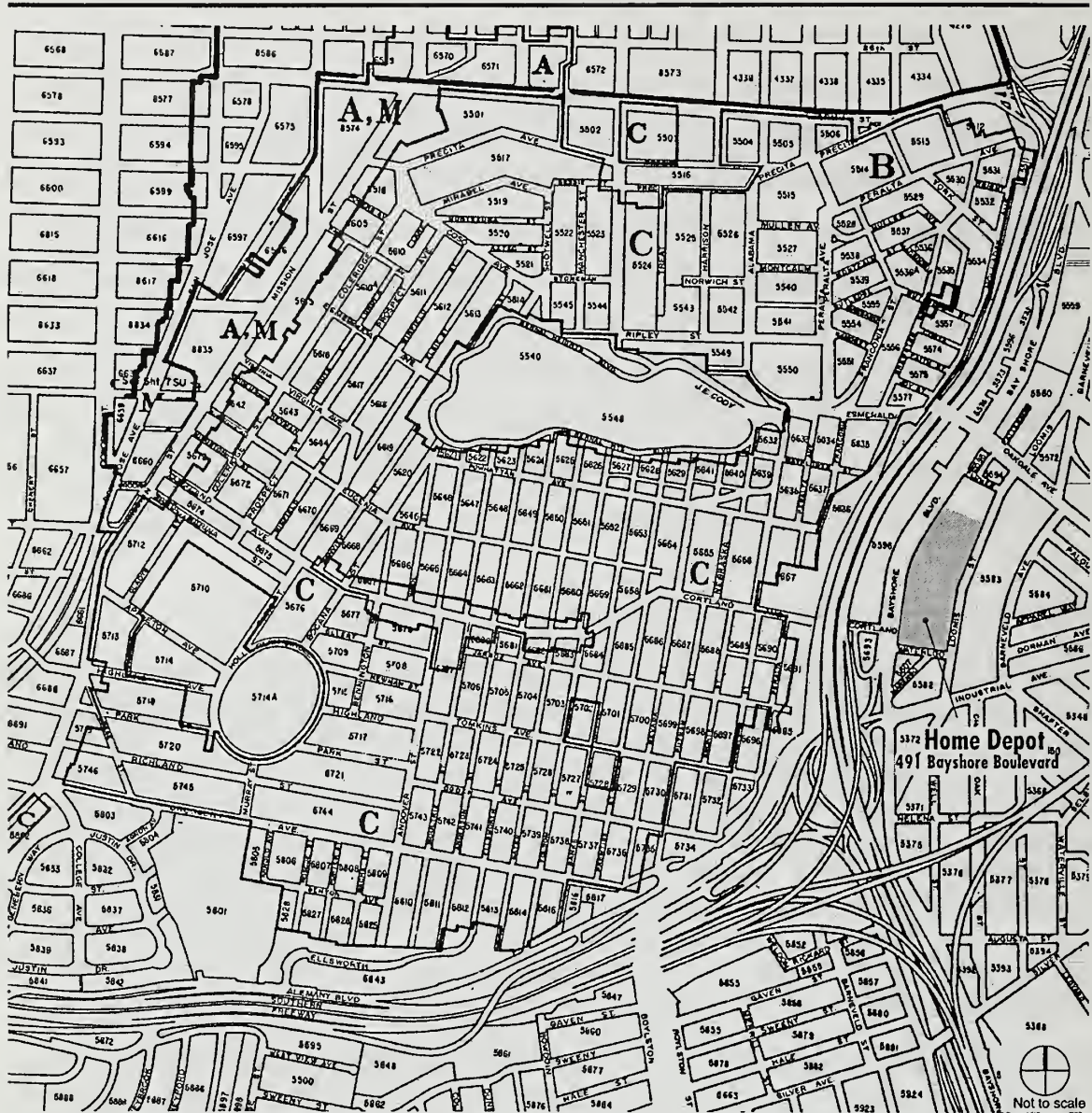
"The 'policy' list is so much eyewash. There is absolutely no analysis of any of this. Nor does the EIR provide information with which to do the analysis. For example, page 41, Policy 6 - 'avoid an overwhelming or dominating appearance in new construction' would reasonably have required renderings showing the appearance of the project from various perspectives, but none have been provided." (*Sue C. Hestor, Attorney at Law, on behalf of Cole Hardware*)

Response #27

The Planning Commission will evaluate the proposed project against the provisions of the *General Plan* and will consider potential conflicts as well as consistency with the *General Plan* as part of the decision-making process (see page A-10 in the EIR).

VII. COMMENTS AND RESPONSES

LAND USE, GENERAL PLAN COMPLIANCE, AND ZONING



- A House Character districts
- C Mixed House and Apartment Character districts
- M Public Use district

Source: City and County of San Francisco Planning Department

6-24-05

BERNAL HEIGHTS SPECIAL USE DISTRICT FIGURE C&R 12

As noted on page A-10 in Appendix A of the DEIR, the City's *General Plan*, which provides general policies and objectives to guide land use decisions, contains some policies that relate to physical environmental issues. The current project would not obviously or substantially conflict with any such policy. In general, potential conflicts with the *General Plan* are considered by decision-makers independently of the environmental review process, as part of the decision whether to approve or disapprove a proposed project. Any potential conflict not identified in the DEIR could be considered in that context, and would not alter the physical environmental effects of the proposed project. With respect to the specific policies identified by the Commissioner, the plans of the project are schematic in nature and are not at the level of detail required for working drawings. Thus, the specific routes for truck deliveries, entry to the project, and loading are not shown in the plans, but are discussed on pages 72 and 73 of the DEIR. No significant impacts were identified.

The South Bayshore Element of the *General Plan* contains objectives and policies that may be relevant to the proposed project. The following subsection will be added to the DEIR on page 41, prior to the Zoning section:

"South Bayshore Area Plan Element

- Policy 3.1, to 'improve and establish truck routes between industrial areas and freeway interchanges.'
- Policy 4.1, to 'develop a comprehensive network and schedule of roadway improvements to assure that South Bayshore maintains an adequate level of service at key intersections as the residential and work force population in the district increases.'
- Policy 7.3, to 'develop secondary nodes of commercial activity.'
- Objective 8, to 'strengthen the role of South Bayshore industrial areas in the overall economy of the district, the city, and the overall region.'
- Policy 8.1, to 'maintain industrial zones in Northern Industrial and India Basin subdistricts.'
- Objective 9, to 'improve linkage between growth in South Bayshore industrial areas and employment and business needs of the Bayview Hunters Point community.'

The proposed project would conform directly or indirectly with the above policies. The improvements to Bayshore Boulevard as described on page 33 in the DEIR would be designed to maintain an adequate level of service. The project would strengthen the

economy in South Bayshore and would be a permitted use in the South Bayshore industrial area. The First Source hiring program identified in Comment #15 would improve linkage between economic growth in the South Bayshore industrial areas and employment needs of residents in the Bayview Hunters Point area.

Comment #28

"Home Depot is known for their predatory market practices. We have many viable businesses that are directly threatened. Home Depot is not a local business. Profits do not circulate in our community, they go back to Atlanta." (*Jean Fontana, Resident*)

"Home Depot has a history of coming into an area, pricing its goods so that they undercut neighboring hardware stores, and within a few years they are all out of business." (*Sue C. Hestor, Attorney at Law, on behalf of Cole Hardware*)

Response #28

The commenters have not provided any information to substantiate their allegations regarding the history of Home Depot pricing practices. The commenters have not provided, nor is the City aware of, any information suggesting that any potential economic effects of the proposed project would, in turn, cause environmental impacts.

According to Section 15131 of the CEQA *Guidelines*, "economic or social information may be included in an EIR or may be presented in whatever form the agency desires." Section 15131(a) states, "economic or social effects of a project shall not be treated as significant effects on the environment. An EIR may trace a chain of cause and effect from a proposed decision on a project through anticipated economic or social changes resulting from the project to physical changes caused in turn by the economic or social changes. The intermediate economic or social changes need not be analyzed in any detail greater than necessary to trace the chain of cause and effect. The focus of the analysis shall be on the physical changes." Section 15131(b) states in part, "economic or social effects of a project may be used to determine the significance of physical changes caused by the project."

In other words, the economic or social impacts of the proposed project are not relevant to the analysis of environmental impacts, and thus need not be evaluated in an EIR, unless there is evidence that the economic or social effects of the project would produce significant environmental impacts, such as urban decay. It is unlikely that any potential economic

impacts of the proposed project will result in environmental impacts, such as urban decay. This conclusion is based on the results of two economic studies examining the potential fiscal impacts of the proposed project.

The Sedway Group prepared an economic impact report for the project sponsor in January 2002 that examined the potential fiscal and economic impacts of the proposed store.⁹ The 2002 Sedway Study is included in Appendix E (as Exhibit C to the Anna C. Shimko Letter dated July 11, 2003) to this document. In February 2005, it prepared an update to that economic impact report (the "Sedway Study") to reflect current economic conditions, including a planned Home Depot in Daly City.¹⁰ The Planning Department had the Sedway Study peer-reviewed by Economic Planning Systems, an economic consulting firm (the "EPS Study").¹¹ The EPS Study concurred with the conclusions in the Sedway Study. These reports are summarized below. Based on the conclusions found in these studies, neither physical deterioration of existing commercial areas and/or urban decay would be a likely or reasonably foreseeable result of the proposed project.

The updated Sedway Study estimated that San Francisco currently loses approximately \$360 million each year in building materials sales. The Sedway Study also estimates that the proposed store would be expected to average about \$45 million in building materials sales. On the basis of this study, San Francisco could continue to lose over \$300 million a year of potential building materials sales to stores outside the City limits even with the proposed project. In other words, even with the proposed project, San Francisco residents would demand larger amounts of building materials than the proposed project could supply. Likewise, San Francisco residents are likely to demand larger amounts of garden supplies than the proposed project plus all the other garden supply retailers in the City could supply.

⁹ Sedway Group, *Economic Impacts of Proposed San Francisco Home Depot Store*, January 2002. This report is on file and available for review by appointment at the San Francisco Planning Department, 1660 Mission Street, Fifth Floor, San Francisco, as part of Case File 2001.0062E.

¹⁰ Sedway Group, *Economic Impacts of Proposed San Francisco Home Depot Store*, February 2005. This report is on file and available for review by appointment at the San Francisco Planning Department, 1660 Mission Street, Fifth Floor, San Francisco, as part of Case File 2001.0062E.

¹¹ Economic and Planning Systems, *San Francisco Home Depot Study Peer Review*, June 22, 2005. This report is on file and available for review by appointment at the San Francisco Planning Department, 1660 Mission Street, Fifth Floor, San Francisco, as part of Case File 2001.0062E.

The Sedway Study noted that San Francisco attracts customers from outside the City limits in the following sales categories, all of which are sold as part of Home Depot's retail operations: home furnishing; plumbing and electrical supplies; and paint, glass and wallpaper. It may be possible that Home Depot would attract some percentage of the dollars spent in these categories that would otherwise have gone to existing retailers in the City. The Sedway Study estimated that, in a worst-case scenario (i.e., where each dollar earned by Home Depot in these categories is a dollar lost by existing retailers within San Francisco), the maximum loss in sales that existing stores would experience in the home furnishing; plumbing and electrical supplies; and paint, glass and wallpaper categories would be approximately 3.5 percent, 11.4 percent, and 19.3 percent, respectively. The Sedway Study suggests that there could be factors that could lower the potential sales losses such as: 1) other businesses could specialize in certain types of products not carried by Home Depot; 2) they could improve their customer service; 3) they could enhance their marketing activities; and/or 4) they could benefit from trends of rising demand for such products.

The Sedway Study further found that any economic impacts from the currently planned Home Depot in Daly City would not result in environmental impacts such as long-term economic decay or blight. Sedway calculated that Daly City itself is losing money to non-local stores in each of the home improvement categories that Home Depot sells, totaling over \$134 million in lost sales per year. According to the Sedway Study, when the Home Depot is constructed in Daly City, there would still be leakage of approximately \$100 million in home improvement sales to stores outside of Daly City. This would imply that Daly City residents currently demand far more home improvement goods than that city can supply, so the Home Depot to be constructed in Daly City would recapture Daly City's demand, not cause additional leakage from or possible store closures in San Francisco. Even when considered in conjunction with the planned Daly City store, the Sedway Study concluded that the proposed project would not contribute to physical deterioration and/or urban decay.

The EPS Study generally concurred with these conclusions, and found that even if sales at the proposed Home Depot were stronger than expected, or even if all of Home Depot's sales were derived from stores currently operating in San Francisco, the amount of leakage to stores outside San Francisco (\$291 million) represents a very large under-served market that other retailers could serve, even if it requires re-merchandising or re-positioning of existing stores.

The EPS study noted that it is possible that certain retail properties, particularly larger properties or those in lower-income areas may be more difficult to re-tenant if they should close. However, market demand for housing and retail space in San Francisco is strong, and commercial and industrial space demand is projected to increase. Thus, long-term vacancies are unlikely, since most space will be either re-tenanted or positioned for alternative uses. The EPS study therefore concurred with the Sedway Report's conclusion that the introduction of Home Depot is not likely to result in long-term vacancies or urban decay in San Francisco.

As noted in Response to Comment #24, in order to confirm a connection between the economic or social effects of the proposed project to environmental impacts, there must be evidence that the operation of the proposed project would result in the closure of competing retail stores, that the space occupied by such closed stores would not be reused within a reasonable time, and that the long-term vacancy of the space would result in physical deterioration or urban decay. No evidence has been presented by the commenter that identifies a chain of events linking the project sponsor's store, alone or in conjunction with the planned Home Depot store in Daly City, to an adverse impact on existing retail stores, which would result in an environmental impact. As discussed in Response to Comment #24, the economic effects of a project are not treated as significant effects on the environment unless there is a chain of events linking the economic effects to environmental effects such as physical deterioration or urban decay. The Sedway Study found, and the EPS study concurred, that while some stores might experience a decline in sales, even if such stores were to close, the introduction of the proposed Home Depot is not likely to result in long-term vacancies, due to the market demand for housing and retail space, and projected growth in the demand for commercial and industrial space in San Francisco.

Comment #29

"The City is compelled to discourage development that has substantial undesirable consequences that cannot be mitigated.¹" (*Eve Bach, Arc Ecology Consultant; Barbara Kyle, Resident/No Depot Committee Chair; and Ron Morgan, Bernal Heights Neighborhood Center Community Organizing Coordinator*)

¹ DEIR, page 40.

Response #29

The commenter references Objective 1, Policy 1 of the Commerce and Industry Element of the *San Francisco General Plan*, which states that the City should "*encourage development which provides substantial net benefits and minimizes undesirable consequences. Discourage development which has substantial undesirable consequences that cannot be mitigated.*"

The DEIR identifies relevant objectives and policies of the *General Plan* that the Planning Commission would consider independently of the environmental review process, as part of the decision whether to approve or disapprove the proposed project.

OTHER PLANS AND POLICIES

Comment #30

"This EIR is flawed because it doesn't take into account the City Planning Department's stated plans to rezone all of Bayshore Boulevard to encourage big box development.

"But I don't think any of the dozens and dozens of us who are here today to oppose this project want Bayshore to stay the way it is. Far from it. I, for one, am strongly in favor of development along Bayshore; it's run down, ugly, and underutilized.

"However, this kind of development is wrong for Bayshore. Instead, Bayshore could and should be developed as a mixed-use corridor, much like parts of Geary Boulevard. There, commercial uses coexist with apartments on the upper floors, and a street which carries a significant amount of traffic and of course the busiest line in the Muni system. We need housing, not more traffic.

"In 2001, I participated in community planning workshops along with hundreds of other neighbors from Bernal Heights, Bayview, and the Mission. No one there wanted Bayshore to be a dumping ground for big box stores and traffic. Please reject Home Depot at this inappropriate location."
(Shannon Dodge, Resident)

"The [Cortland Merchants Association] CMA also realize that it would be short-sighted and poor planning indeed to approve the 140,000 SF project, effectively exhausting the environmental criteria so as to prevent the predictable development of future sites along Bayshore Boulevard. This would deny the future, like eating the seed corn.

"And we are having growing pains. The CMA is already responding to concerns about parking, traffic calming, inadequate street lighting, unpainted pedestrian school crossings, sidewalk cleaning, tree planting, and neighborhood beautification. These issues are our priorities. We respectfully request that you not approve any plan that would disproportionately further burden our community. Not only our quality of life, but the character of our community is in jeopardy. We ask you to protect the nature and character of our community as vigilantly as our air quality standards.

"On the other hand, we support a (generic) development of the site. Any development of this site should require that we all, and by 'we all' I mean: the Bernal Heights community (residents, merchants, customers, religious and community organizations), the other San Francisco communities, the San Francisco Planning Department, the City and County of San Francisco Board of Supervisors and Administration, and of course the developer, need to come to a written agreement that Bernal Heights and Bayview deserve priority access to funds and programs regarding traffic calming, parking, affordable housing, jobs, and neighborhood beautification. We are the immediate communities. Help us move farther toward the realization of our goals as already defined. Help us preserve and protect the neighborhood that we cherish. Let's work together for our mutual benefit." *(Michael Grafton and David Ayoob, Co-Presidents, Cortland Merchants Association)*

"Page 34 [of the DEIR:] Please explain the relation of this project to the Redevelopment Agency and the Agency's role thereon.

"Pages 35 and 37 [of the DEIR:] There is a difference between a neighborhood and a planning area. The industrial area in which this site is situated is between two neighborhoods – Bernal Heights and Bayview Hunters Point – and is near another neighborhood – Portola.

"Please explain all of the planning studies underway for this site, including that of the Planning Department. The Department has released three alternative development scenarios for the Bayshore corridor. They involve zoning which allows big box facilities the length of Bayshore between Jerrold and Highway 280. One alternative is two blocks deep. This rezoning proposal must be discussed since it has a major impact on cumulative development and cumulative traffic. In other words, there is more than the Redevelopment Concept Plan at work here." *(Sue C. Hestor, Attorney at Law, on behalf of Cole Hardware)*

Response #30

Over the past three decades, planning efforts have been initiated and continue to be pursued in the Bayview Hunters Point area, as well as other Eastern Neighborhoods (Showplace Square/Potrero Hill, Mission, and South of Market). These planning efforts have been undertaken primarily by the San Francisco Planning Department and the Redevelopment Agency, with citizen input, and the BVHP-PAC. Some of these planning efforts have resulted in planning and redevelopment documents. The Planning Commission would review the redevelopment plan for the area and would need to determine if the plan would conform to the *General Plan*. At present, responsibility for approval or denial of the proposed project rests with the Planning Commission. Certification of the EIR by the Planning Commission is appealable to the Board of Supervisors. The project is not subject to the approval of the San Francisco Redevelopment Agency because no final redevelopment plan has yet been adopted for the area. Even if a redevelopment plan for the area in which the project is located were adopted, the Planning Department would be the approval body for the area. Therefore, the project is solely within the Planning Commission's jurisdiction.

San Francisco Redevelopment Agency Plans

One of the earliest efforts in the area was the Redevelopment Agency's *Hunters Point Redevelopment Plan*, originally approved and adopted by the Board of Supervisors in January 1969 with later amendments adopted in August 1970, December 1986, and December 1994. On December 12, 1994, the life of the plan was extended to the year 2019. The Redevelopment Plan was primarily residential, based on a Master Plan by Aaron G. Green, architect, and it included community facilities and improved street patterns. The plan covered only a small area in Hunters Point, and the proposed Home Depot site is not in the plan area.

State law requires that a survey area be designated prior to the initiation of any redevelopment effort within that area. The Redevelopment Agency identified a survey area, which included essentially all of the area south of Army Street (renamed Cesar Chavez Street) and east of U.S. 101 in the January 1995 *South Bayshore Survey Area*. The project site was included in the survey area.

During the next seven years, the San Francisco Redevelopment Agency worked with the community to identify economic and physical problems in the survey area, and determined that redevelopment is an appropriate method to address those problems. As a part of this evaluation, in 2001, a *Concept Plan* for the area was prepared to address the issues that are important to the survey area's revitalization. The proposed project site was shown in the *Concept Plan* as part of a sub-area proposed for continued industrial and various types of commercial use.

In October 2003, the *Preliminary Redevelopment Plan for the Bayview Hunters Point Redevelopment Area* was prepared by the Redevelopment Agency. The Preliminary Plan called for changes to the existing zoning to allow for a mix of industrial and commercial uses in the redevelopment area. The project site is designated in the Preliminary Plan for commercial use. The proposed project site has a general zoning designation in the Preliminary Plan for production, distribution and repair (PDR) and large commercial use, however, the specifics of the actual zoning controls have yet to be determined.

In March 2003, a document titled *Draft Framework Housing Program/Bayview Hunters Point Redevelopment Project* was prepared by the Redevelopment Agency and the BVHP-PAC. Prepared as a specific guide for housing in the Bayview Hunters Point area prior to the implementation of the new *Redevelopment Plan*, the Housing Program document recognized that the *Redevelopment Plan*, the *Planning Code* and the *Zoning Maps* would control the specific use of the buildings in the area; and in the event of a conflict, the *Redevelopment Plan* would govern. The *Bayview Hunters Point Redevelopment Projects & Activity Nodes Map*, October 2003, designates the project site as PDR for commercial use in the "Oakinba" area, a designation for the area bounded by Oakdale Avenue, Industrial Street, and Bayshore Boulevard.

An EIR for the preliminary *Bayview Hunters Point Redevelopment Area Plan* is currently being prepared, and is expected to be certified sometime in 2005. A final redevelopment plan is being developed while that environmental review is under way, and after certification of the EIR, any necessary *General Plan* amendments would be considered and adopted or rejected. Redevelopment plans are reviewed and approved by the Redevelopment Commission and approved and adopted by the Board of Supervisors. After the final *Bayview Hunters Point Redevelopment Area Plan* is developed, the Redevelopment Commission would review and adopt or reject the plan. The Planning Commission must find it to be in conformance with the City's *General Plan*, and notify the Board of Supervisors of its findings. The Board of Supervisors would then consider the redevelopment plan, and can either adopt, modify, or reject it.

Planning Department Plans

In July 1995, the Planning Commission adopted the *South Bayshore Area Plan* as part of the *General Plan*. This area plan covers the same general area as the Redevelopment South Bayshore Survey Area. The Home Depot site is in a Subdistrict called the Northern Industrial Area and is designated for light industrial land use. As noted in Response to Comment #27, a section has been added to the DEIR regarding the *South Bayshore Area Plan Element*.

In late 2001, the Planning Commission directed the Planning Department to initiate the Eastern Neighborhoods community planning process which included the neighborhoods of Bayview Hunters Point, Showplace Square/Potrero Hill, Mission and South of Market. The purpose of this process was to address the broad range of issues involved in formulating permanent controls on the City's last remaining industrially zoned lands and its surrounding residential and commercial neighborhoods. The purpose of the community process was to work collaboratively with the neighborhoods in the vicinity of these industrially zoned lands to develop rezoning proposals that achieve both neighborhood and citywide land use goals. In early 2002, the Planning Department initiated a series of workshops in these neighborhoods. Through the public workshop process, participants grappled with how the area's industrially zoned land should be used in the future. One of the goals of this process was to develop a new set of zoning regulations for the broader Bayview Hunters Point Area, including the project site. In February 2003, the Planning Department published the *Community Planning in the Eastern Neighborhoods, Rezoning Options Workbook – First Draft* ("Workbook"). This document proposes to replace M-1 and M-2 zoning with new production, distribution and repair (PDR) districts. The PDR designation has four levels:

Light PDR. Includes auto repair, small catering services, graphic design, small radio stations and small messenger operations, and are considered to be compatible with residential uses. They would generally be about 4,500 square feet.

Medium PDR. Includes printers and publishers, showrooms, landscaping and horticultural services, film producers and catering. These uses would be smaller than 10,000 square feet.

Large Commercial PDR. Includes large retail activities, including some "Big Box" operations with large parking areas and access to the freeway.

Core PDR. Includes trucking operations, apparel manufacturing, distribution centers for produce, canned food, vegetables, meat, seafood, and flowers; suppliers of materials used in the construction industry – lumber, pipes, large equipment rentals, and electrical; large showrooms, paper manufacturing and large publishing. These uses would need large floorplates.

The Workbook puts forward three zoning options for the Bayview Hunters Point Community Planning Area, basically differing in terms of the amount of area and density designated for PDR and housing uses. The Home Depot site, which is currently zoned M-1–Light Industrial, is proposed to be zoned as follows in one of these three zoning options with a proposed height limit of 50 to 55 feet:

Options	Proposed Zoning
Option A	Core PDR
Option B	Large Commercial/PDR
Option C	Large Commercial/PDR

The Planning Commission's consideration of the options for each neighborhood may refine these options or develop new ones using ideas presented in the overall spectrum of options. The main options for the Bayview Hunters Point would be forged into a proposed rezoning for the Redevelopment Area and become part of the *Bayview Hunters Point Redevelopment Area Plan*. The EIR certification and plan adoption is expected to occur in 2005 or 2006.

Neither the Redevelopment Agency nor the Planning Department have an official definition of "Big Box Retail;" nor is it designated in any of the Workbook zoning options. This is an unofficial term that is not in the actual planning nomenclature.

PDR and large commercial uses are currently permitted by the *Planning Code*, however the Planning Department does not actively encourage "Big Box Retail" or "Big Box Alley." The Eastern Neighborhoods Workbook calls for conditional use authorization for any project above 40,000 gross square feet.

Comment #31

"Pages 35 and 37 [of the DEIR:] The Redevelopment Agency cannot designate a redevelopment area without a finding of blight. They have not yet made such a finding for this area. Although Ms. Zimmerman has (apparently consciously) allowed this site, and her adjacent properties to deteriorate, ironically, the development of this site with a Home Depot may adversely affect the Agency's ability to make a finding of blight and therefore put this site into a Redevelopment area. If that does not occur, the zoning pursuant to the Planning Code will be operative." (*Sue C. Hestor, Attorney at Law, on behalf of Cole Hardware, written comments*)

"The cover of the EIR is the first page I want to direct your attention to. What it shows is the site. What it doesn't show you is how blighted the site is, because the applicant for this project is not only Home Depot; it is Joan Goodman Zimmerman, one of the Goodman children, who basically forced the closure of the store and has not maintained the site. Ironically, if this site is developed it will make it even harder for the Redevelopment Agency to justify a redevelopment area for this area, because they haven't made a finding of blight, and the blighted conditions are the conditions caused by this owner." (*Sue C. Hestor, Attorney at Law, on behalf of Cole Hardware, oral testimony*)

Response #31

The project site is currently vacant as shown on the cover of the DEIR and in Figures 8 and 9, pages 38 and 39. Additionally, Figures C&R.2 through C&R.5 have been provided for informational purposes that show project photo simulations with insets of existing conditions (see Response to Comment #1). As noted in Response to Comment #30, the designation of the Bayview Hunters Point Redevelopment Area and a blight study are still in process. The proposed project would conform to the existing *Planning Code* and the proposed Redevelopment land use designation for the proposed project site.

ZONINGComment #32

"Pages 41 and 42 [of the DEIR:] Again, you ignore the planning process underway at the Planning Department for industrial zones. Please explain whether this project will be paying the JHLP [Jobs-Housing Linkage Program] fee. In its original application, the sponsor had manipulated the square footage calculations so that they would not have to pay any fee whatsoever. Do they meet the net new square footage threshold for retail?" (*Sue C. Hestor, Attorney at Law, on behalf of Cole Hardware*)

Response #32

As noted on page 42 of the DEIR, the proposed construction of more than 153,100 sq.ft. of retail space, if approved, would be subject to the application of the Jobs-Housing Linkage Program (JHLP) (*Planning Code* Sections 313.5 and 313.6), which would require the project sponsor to construct affordable housing or to pay an in-lieu fee for development of affordable housing by others. Also see Response to Comment #30 regarding ongoing planning efforts in the industrial-zoned areas.

EMPLOYMENT

Comment #33

"Day Labor Facilities: At various points in the discussion of day labor facilities, the Home Depot site was mentioned as a possible location for day laborers to come to connect with persons looking to hire day laborers. Has Home Depot been in any discussions about this issue? If day laborers were to be located in this area, where would they be sited? If there was no formal location, but people came anyway, they would presumably be on Bayshore. How would their presence affect traffic flow and assumptions of congestion?" (*Sue C. Hestor, Attorney at Law, on behalf of Cole Hardware*)

Response #33

In January 2003, La Raza Centro Legal was issued a Categorical Exemption from the environmental review process to operate a number of services for day laborers at 3358 Cesar Chavez Street between Mission Street and South Van Ness Avenue.¹² The proposal was to convert the ground floor of an existing building to a community service office, which would serve the San Francisco Day Labor Program (DLP). The existing office at 17th and Hampshire Streets relocated to the new facility in the fall of 2004. The day laborers congregating on Cesar Chavez Street would be able to use the services of the DLP, which provides job coordination, English classes, employment counseling, and other worker-oriented services.¹³ Cesar Chavez Street is over a mile north of the project site.

Representatives of Home Depot have been approached by concerned members of the public several times during the past several years regarding how the proposed project would relate to the day labor issue in San Francisco. Home Depot has indicated its willingness to work with the City regarding the day labor issue. Home Depot has no plans to create a day labor center at or near the project site due to site constraints and liability issues. If day laborers congregate on the project site and become a nuisance, Home Depot would escort the laborers off its property and would also rely on law enforcement as necessary to ensure that they do not congregate on sidewalks and in streets. In the event that day laborers persist in congregating outside the store, there could be a potential for conflict between pedestrians and

¹² *Certification of Determination of Exemption/Exclusion from Environmental Review, San Francisco Day Labor Program*, January 8, 2003. This document is on file and available for review by appointment at the San Francisco Planning Department, 1660 Mission Street, Fifth Floor, San Francisco, reference 3358 Cesar Chavez Street, January 8, 2003.

¹³ Monica Garcia, La Raza Centro Legal, telephone conversation, August 31, 2004.

traffic, as well as potential traffic disruptions associated with vehicles stopping to solicit services from day laborers. However, these potential effects would not be significant.

CEQA Section 15064(d)(3) states an *"indirect physical change is to be considered only if that change is a reasonably foreseeable impact which may be caused by the project. A change which is speculative or unlikely to occur is not reasonably foreseeable."* The future existence of a day labor center at the proposed project site is highly speculative. Therefore, the DEIR did not evaluate the possible pedestrian, traffic or other environmental impacts of a day labor center.

Comment #34

"Page 11 [of the DEIR]: There is no verifiable source of information for the following statement: 'It is anticipated that most of the new employees would already reside in San Francisco, while some employees from outside the City may seek housing within the City boundaries.'

"What is the basis for expecting most new employees to be San Francisco residents, especially given the high cost of housing in San Francisco and the very low wages paid by Home Depot to most employees? What is the level of housing costs that entry-level full-time Home Depot employees can afford at 30 percent of their income? How does this compare to the median costs of housing in San Francisco for a family of four? What is the vacancy rate for housing that the average Home Depot employee could afford? How far will workers have to travel to find housing they can afford?

"And how does the assumption that so many employees will live in San Francisco cause air pollution impacts to be understated?" (*Eve Bach, Arc Ecology Consultant; Barbara Kyle, Resident/No Depot Committee Chair; and Ron Morgan, Bernal Heights Neighborhood Center Community Organizing Coordinator*)

"What is the basis for the project sponsor's statement that most employees would already reside in San Francisco?" (*Ron Morgan, Bernal Heights Neighborhood Center Community Organizing Coordinator*)

Response #34

On page A-13 of the Initial Study in Appendix A of the DEIR, it states that the proposed project would be expected to fill the employment openings from the existing City and regional labor pool. Based on information regarding the residences of employees at other Home Depot stores in the Bay Area, the project sponsor anticipates that future employees at the proposed project would already live in the City or nearby. The project sponsor is also working with community groups to coordinate job opportunities for local residents and has signed a First Source hiring agreement with the City of San Francisco to provide employment for community residents (see Response to Comment #15). As noted in Response to

Comment #157, starting salaries at the proposed store would average \$11 to \$13 per hour for employees with no experience, which is higher than San Francisco's Minimum Compensation Pay Rate applying to larger for-profit employers (\$10.77 per hour), and also higher than the Federal Minimum Wage (\$5.15 per hour) and California's Minimum Wage (\$8.50 per hour). Employees with extensive experience in a trade may be eligible to receive a higher starting salary.

The analysis of air quality impacts was based on the generation of vehicle-trips that was determined by surveys of other Home Depot stores that included store size and numbers of customers and employees. The air quality analysis considered the average vehicle trip length (among other factors) in the computer modeling of air quality impacts. Most of the project-generated vehicle trips would be customer trips and not employee trips. The DEIR did not assume that air quality impacts would be directly affected by the location of employee residences. It is possible that if employees were to live nearby, they might be commuting to work at shorter distances that could lower the trip length, which in turn could lower the overall air quality impacts of the project. The air quality analysis in the DEIR, however, did not consider this factor. It is also possible that employees would be commuting to work at longer distances that could increase trip length, which in turn could raise the overall air quality impacts of the project; however, for the reasons discussed above, it is anticipated that potential employees would live in the City or nearby and would not be commuting at longer distances.

Comment #35

"I have gone to Home Depot. It is kind of an experience where you really have to fend for yourself, and really know what you want going in. The salespeople really are not trained for a vocation for the future. These are dead-end jobs. I'm sure there is some sort of establishment that you can put in there that can really address youth's needs for employment, so they can build a vocation for the future. This does not do that." (*Dory Steinberg, Resident*)

Response #35

As noted in the DEIR on pages 1 and 2, and on pages A-11 and A-13 in Appendix A of the DEIR, the site is currently vacant and the project would generate new employment opportunities. As described in Response to Comment #15, Home Depot has entered into a First Source hiring agreement aimed at training and employing at least 150 residents from the

community. In addition, the project sponsor would require the general contractor for the construction of the store to ensure that at least 50 percent of the person-hours spent to construct the store would be performed by San Francisco residents. The issue of employment practices by the project sponsor is beyond the scope of the CEQA-required environmental analysis. However, for informational purposes, their employment practices are discussed in this chapter, pages C&R.81 to C&R.86, and the Community Commitments the project sponsor has made regarding hiring is included in this Final EIR as Appendix G.

Comment #36

"Page 11 [of the DEIR]: Numbers do not add up. The EIR estimates the daily population would increase by 2,500 to 3,300 people per day, comprised of 75-100 employees and 'as many as 2,500 to 3,000 shoppers per day.' The maximum total of shoppers and employees is 3,100. At the 7/10/03 public hearing, one speaker (Angelo King) stated that the sponsor is now acknowledging that this number is an error. What is the correct number and how was it calculated? What data provide the basis for these projections? What assumptions were used in making this projection? We need to be able to review the underlying data before we can comment on the accuracy and/or suitability of a corrected employment projection. The projection of customers should also be reviewed since it appears to conflict with traffic projections of about 1,000 trips just in the peak hour. We need to review the data and methodology for this projection as well." (*Eve Bach, Arc Ecology Consultant; Barbara Kyle, Resident/No Depot Committee Chair; and Ron Morgan, Bernal Heights Neighborhood Center Community Organizing Coordinator*)

"I'm a small business owner of the Bayview. Like many of my neighbors, friends and associates in Bayview and Bernal communities, I share the desire for a revitalized Bayshore corridor, for new commerce and growth, and a home improvement supply store. In evaluating any proposal for such a store, we must rely on the accuracy of any information and factual data in order to make the best decisions on behalf of our communities, ourselves and on behalf of the larger San Francisco community. After reviewing the DEIR before us, it became clear that a number of inconsistencies formed the basis of the criteria used for the conclusions drawn. Specifically, on page 11 [of the Draft EIR], the information on daily population presumes a hundred daily employees and 3,000 shoppers per day. We know [from our lengthy discussions with the project sponsor] that the employment figure is actually 300 [three times the stated figure], and I acknowledge the correction made this week by Home Depot – that's after two and a half years of discussion. Yet some numbers do not add up. Despite my repeated request of the project sponsor to clarify the building size in the EIR documentation, the stated 156,000-square-foot store does not reflect the actual 226,000-square-foot store and included parking areas. We need documentation for the clarification. It was recently stated by the Home Depot architect in public that, quote: 'The Bayshore store will be one of the largest Home Depot stores in the nation.' If the 100-daily-employee figure is incorrect, is the 3,000 shopper-per-day figure – which is the basis for the traffic study and resulting significant impact on regional air quality – also accurate?" (*Daniel Dodt, Resident, Chair of the BVHP-PAC Economic Development Committee, Member of the Bayview Merchants Association and Revere Avenue Residents Association, oral testimony*)

"The resulting traffic and parking requirements for these employees are, by extension, incorrectly noted in the Draft EIR documentation. See the related conclusions drawn on pages 6, 19, 21, 26, 58, 70, 103, 117, and in the appendices. I acknowledge the correction made in the July 7, 2003 letter addressed to the BVHP-PAC by the project representatives on this point, but now question the validity of the related 'daily customer' figure of 3,000. Traffic and environmental impacts are compounded as these figures increase. The project sponsor had ample opportunity to review and clarify the accuracy of the facts submitted in preparation of the draft documentation, in my opinion, and the misleading information contained within the original draft is not acceptable.

"Other numbers do not add up: Despite my repeated requests of the project sponsor to correctly identify the physical building size in the EIR, the stated 156,000 sf size (pages 2, 11, 25, 26, 42, and appendices) does not reflect the actual 226,000 sf store and included parking areas. It was recently stated by the project architect that the Bayshore store would 'be one of the largest stores in the nation' by this company. If the size is mis-stated, the 100 daily employee figure is incorrect, and the shopper per day figure, which is the basis for the traffic study and resulting significant impact on regional air quality, also questionable, how can we rely on the Draft EIR as an accurate representation of the project impacts?

"We should be given the opportunity to evaluate this proposed development based on accurate data. It would be irresponsible of us as citizens and planners to accept this document as written, in my opinion. The only reasonable action as a conclusion to the information submitted is to accept the Alternate A or Alternate B as described on pages 116 and 117, or to request of the project sponsor a complete re-submittal of the Environmental Impact Report with accurate and up-to-date information and data. I respectfully ask that you reject the findings contained within the Draft EIR document. Thank you for your consideration." *(Daniel Dodt, Resident, Chair of the BVHP-PAC Economic Development Committee, Member of the Bayview Merchants Association and Revere Avenue Residents Association, written comments)*

"I have been in the community for 45 years, and there are some concerns regarding the EIR that I would like to voice at this time. There are some inaccuracies, as far as some of the numbers are concerned. We all know that. There are several of them. While I cannot address all of them, there is one in particular, which is the employment number, that is of great concern. Now I applaud Home Depot, because they have been made aware of this inaccuracy, and have stated that they will correct it. However, the same number that is indicated in the EIR has been quoted time and time and time again at community meetings. So is that to say that those numbers that were quoted at the community meetings were also inaccurate? And if that's the case, shouldn't there be other community meetings, so that the public can be made aware that those numbers were inaccurate? I think this needs to be addressed in your voting. I would hope you would consider it." *(Eloise Patton, Resident)*

Response #36

As noted in Response to Comment #10, the proposed project would consist of an approximately 153,089 sq.-ft. home improvement center, which includes approximately 96,250 sq.ft. on the main floor, 38,405 sq.ft. on the second floor, and an approximately 8,546 sq.-ft., outdoor garden center plus a 9,888 sq.-ft., enclosed greenhouse. The parking garage would be approximately 235,597 sq.ft., constructed as a separate structure that would contain the 38,405-sq.-ft. second floor sales area.

The DEIR indicated on pages 11 and 103 that the proposed project would generate approximately 2,500 to 3,000 shoppers per day and approximately 75 to 100 employees per day. The number of estimated employees has been updated since the publication of the Draft EIR. The project sponsor now estimates a daily employee population of approximately 197 employees and a total employee population of approximately 300 employees. The number of total employees is higher than the number of daily employees because not every employee works each day. As noted in Comment #134, based on the employee counts at other Home Depot stores, approximately 180 full- and 120 part-time employees would work at the store each week, for an average count of 128.5 full-time employees and 68.5 part-time employees (a total of 197 daily employees). The DEIR has been revised to reflect the new estimate. Changes were also made to include the employee estimates for the alternatives analyzed in the DEIR. (See Section E – Staff-Initiated Text Changes and Errata, specifically pages C&R.358, C&R.359, and C&R.363 to C&R.365, for locations of text changes to the DEIR.)

The change to the forecasted number of employees would not affect or change the population and transportation analysis in the DEIR. The number of employees is presented in a range and the change identified above would be at a less-than-significant level. The project trip generation numbers calculated in the DEIR are based on the square footage of the store (as determined from driveway counts conducted at other Home Depot stores in California; see Responses to Comments #40 and #41 regarding the methodology for developing project trip generation). These actual counts include both employees and customers, and the number of employees estimated for the project are within the range of the numbers of employees at the surveyed stores. Therefore, the change in the daily employee numbers would not affect the transportation impacts in the DEIR.

URBAN DESIGN

Comment #37

"I cannot understand why we did not have an analysis of design issues in this EIR. You look at this, and it is 787 feet long. There is not one entrance on that front (indicating). There is nothing that interacts as a pedestrian entrance." (*Sue C. Hestor, Attorney at Law, on behalf of Cole Hardware*)

Response #37

As noted in Response to Comment #5, most project customers would access the proposed store through the garage, primarily for convenience as well as security. Most customers would use their vehicles to transport their purchases and would load from the garage. For those customers entering the store on foot from Bayshore Boulevard or Loomis Street, there are separate pedestrian access points to a walkway at the north end of the garage adjacent to the entrance of the proposed store (see Figure C&R.6 on page C&R.27, which replaces Figure 2 in the DEIR on page 28). Pedestrians would access the walkway and enter the store through the same entrance as all customers. Please see the following response for further discussion of design issues.

Comment #38

"I think the project would have a 'negative aesthetic effect.' It will be a much larger building and completely devoid of any character, unlike the smaller varied buildings currently in that block of Bayshore.

"I think the project would 'substantially degrade or obstruct scenic views.' I find the views on Bernal and Bayview hills scenic as I drive south on Bayshore or west on Oakdale Avenue. This project will obstruct those views and increase the sense of being hemmed in by endless walls of concrete. This project will set a dangerous precedent, and therefore make it more likely that other huge boxlike structures will follow." (*Nic Griffin, Resident*)

Response #38

The DEIR indicates (page A-12 in Appendix A of the DEIR) that the visual character of the site would change with the construction of the new buildings. The approximately 34-foot-high store and 38-foot 6-inch high parking garage would be the largest in mass along Bayshore Boulevard in the surrounding area. The project area, however, has an industrial/commercial setting, and the proposed project would be similar in character to other buildings in the area. The proposed buildings would also be similar in height to most other buildings in

the immediate project area, but would be larger in bulk. The *Planning Code* bulk requirements would not apply to the project because the store and parking garage would be less than 40 feet in height. Due to its urban commercial and light industrial setting, the proposed project would not have a substantial, demonstrable negative aesthetic effect.

Views of Bernal Heights from Bayshore Boulevard to the west would be unobstructed by the proposed project since it is located on the east side of Bayshore Boulevard. The views of some of the Bayview Hills from Bayshore Boulevard adjacent to the project may be blocked by the project buildings. However, these changes in views would not be considered a significant visual impact for CEQA purposes, because Bayshore Boulevard is not a scenic corridor nor are there public vista points nearby where views would be affected by the project.

The Initial Study also indicated on page A-12 in Appendix A of the DEIR that the DEIR would address the design of the project in relation to the proposed draft Industrial Area Design Guidelines for the South Bayshore Area Plan, however, as noted above, the new draft South Bayshore Redevelopment Plan is still in process. The new Redevelopment Plan will produce a Design for Development document that would establish new design guidelines for the area. Until then, the 1995 South Bayshore Area Plan sets forth current goals for the overall urban design of the area (see Response to Comment #27). The *Industrial Area Design Guidelines*¹⁴ provide guidelines for industrial buildings in an industrial context.

The following subsection has been added to the DEIR on page 41, prior to the Zoning section:

"Industrial Area Design Guidelines

New industrial buildings must:

- respect the prevailing industrial scale, pattern and architectural character of predominantly industrial blocks;
- utilize innovative materials and design that enrich the architectural character of predominantly industrial areas;

¹⁴ San Francisco Planning Department, *Industrial Area Design Guidelines*, August 2001, page 31.

- provide loading and parking facilities in the rear which can be accessed through an alley or secondary street;
- provide mid-block alleys, courtyards and other design elements that help break down the scale of large industrial blocks; and
- be built to lot line at the street frontage, unless a pattern of a building set-back exists, in which case the prevailing set-back pattern should be reflected."

The proposed project is generally consistent with the design guidelines for industrial buildings. Although the buildings would be larger in massing than other industrial buildings in the area, the height and architectural character would be similar. Although the buildings would be built to the lot lines, there would be design elements along Bayshore and Loomis that would serve to differentiate the facade and break-up the massing. The loading facility would be accessed on Loomis and partially shielded. All parking would be in the garage. There would be street trees on Bayshore Boulevard and Loomis Street. The third floor or roof of the garage would have trellises and landscaping shielding the parked cars when viewed from locations along Bayshore Boulevard, Loomis Street, and from some places on the east slope of Bernal Hill.

Comment #39

"Residents of areas near the project site have raised concerns regarding the amount of light and glare from the rooftop of the store and the adjacent garage. In fact, there is already a considerable amount of light generated during the nighttime hours from the existing uses along Bayshore Boulevard, and Home Depot will not add any light source that will stand out against these other lights. Nevertheless, our architects have carefully designed the structures in order to further reduce the nighttime effects of the store.

"There will be no lights on the top of the store itself. Screening on the second and third levels of the garage adjacent to the store will prevent car lights from within the lower levels of the garage from being seen by residents living on nearby hills. The lights on the topmost parking level will face downward with cut off shields to direct light down and prevent light from spilling over the rooftop parking area. No vehicle headlights will be visible from the top parking level, because the entire level will be surrounded by a 3½-foot wall. Above the 3½-foot wall, half of the topmost parking level will be shielded by continuing the solid wall, and the other half will be concealed by a trellis created with vines strung among horizontal cables. The cables will form a vertical wall reaching to approximately 10 feet above the floor of the topmost level, and then slope inward on an angle toward the parking area to a height of approximately 15 feet. In addition to these concealment measures, there will be trees in planters on the rooftop parking level, which will also function to block light from the garage. Together, the trellis system and plantings should prevent both glare and direct light effects from the garage from being visible from homes in Bernal Heights." (*Anna C. Shimko, Attorney at Law for Home Depot*)

Response #39

On page A-12 in Appendix A of the DEIR, it notes that the proposed project would comply with Planning Commission Resolution 9212, which prohibits the use of mirrored or reflective glass. Thus, the project would not result in the production of additional obtrusive glare affecting other properties. The project would continue to emit relatively low levels of light, similar to those generated in the past by the existing structures, and would not substantially increase ambient light levels in the project area. An approximately 4½-foot-tall wall with a 6-foot trellis containing screening plants would be constructed along the periphery of the roof to shield the glare of parked cars and headlights from the surrounding neighborhood. The lighting for the rooftop parking would be directed downward away from the residences on Bernal Heights. The DEIR concluded that the project light and glare would not result in adverse effects on nearby residents or businesses.

TRANSPORTATION

DATA SOURCES AND METHODOLOGY

Comment #40

"Most of the data used in the DEIR's analysis of traffic impacts were provided by Home Depot. The Planning Department rejected our request for an opportunity to review these data (see attachment 1)¹ during the DEIR review period, making it impossible for us to prepare fully informed comments on the traffic analysis. We must repeat our request that the City must make the data available, and further that they extend the review period to enable the officials and the public to review and comment on the data. At the July 10 public hearing, Commissioner Lisa Felstein asked about Eve Bach's oral comments on this problem. Tammy Chan of the Planning Department replied that all data are in the project file and are available for inspection by appointment. This response was incorrect. Ron Morgan of the Bernal Heights Neighborhood Center inspected the file three times since publication of the DEIR (and twice before that). Because the data underlying the traffic analysis were not in the file, he corresponded with Ms. Chan by email asking what he needed to do to be able to examine the data. Her response was that his request was a comment on the accuracy of the data and it would be included among comments on the DEIR. A copy of the email is attached. [Refer to Appendix E of this document, Eve Bach, Barbara Kyle, and Ron Morgan Letter dated July 24, 2003.]

"We also object to reliance by the Transportation Study on data selectively provided by the sponsor. This practice breaches the firewall between traffic consultant and project sponsor mandated by the City, and severely compromises the integrity of the environmental review process.

"The role of the project sponsor and its representatives during the preparation of the transportation report should be limited to provision of details concerning the project, response to recommended changes affecting project circulation, and indication of support or lack of support for recommended mitigation measures and other transportation improvements identified in the impact report.²

"A traffic analysis based on data selected by the project sponsor³ – especially data that cannot be scrutinized or verified by the public – is not entitled to the deference ordinarily given to the City's discretion. Although it is theoretically possible that the sponsor selected data that accurately represents project conditions, it is equally possible that data were chosen that understate impacts or otherwise predetermine conclusions. The EIR therefore must either provide independent verification that the selected data are accurate, objective, and appropriate, or rewrite the EIR with data that satisfy those standards. In either case, the DEIR needs to be revised and recirculated.

"Much of the data were supplied by Home Depot. The transportation study is supposed to be an independent study on the traffic impacts. Yet, in evaluating current and future conditions, the transportation study relies heavily on data provided by Home Depot itself. We request to see the raw data supplied by Home Depot and the evaluation the City performed of these data. These data include:

- "a. Parking lot counts used to calculate trip generation rates, including in-out split for parking lot queuing analysis (Transportation Study, [DEIR] Appendix C).

- "b. Market share data used to generate trip distribution estimates (Transportation Study, [DEIR] Appendix C).
- "c. Home Depot Parking Study (References in DEIR, page 60).
- "d. Monthly variation in sales (Transportation Study, [DEIR] Appendix C).
- "e. Number and distribution of daily truck trips per day ('Based on information from a similar [unspecified] Home Depot store...' (DEIR, page 72; Transportation Study, 9/02, [DEIR] Appendix [C])).
- "f. Construction workers at peak: 30-40 per day (DEIR, page 7; Transportation Study, 9/02, pages 4-19)." *(Eve Bach, Arc Ecology Consultant; Barbara Kyle, Resident/No Depot Committee Chair; and Ron Morgan, Bernal Heights Neighborhood Center Community Organizing Coordinator)*

¹ Email from Tammy Chan to Ron Morgan, June 27, 2003.

² City and County of San Francisco, Planning Department, *Transportation Impact Analysis Guidelines for Environmental Review*, October 2002, page 4.

³ There is no record in the file of any communication with the consultant asking for data on the specific Home Depot stores that were used as the bases for the traffic analysis.

"The City contracted for a transportation study to be conducted by Wilbur Smith Associates, published in September 2002. This transportation study is inadequate in many areas, and needs to be redone." *(Eve Bach, Arc Ecology Consultant; Barbara Kyle, Resident/No Depot Committee Chair; and Ron Morgan, Bernal Heights Neighborhood Center Community Organizing Coordinator)*

"As we get deeper into the Home Depot Draft EIR, a number of questions have arisen that require further documentation so we may better understand its findings. For now, I'll just list the materials, so let me know their availability:

- "1. Parking lot counts used to calculate trip generation rates, including in-out split for parking lot queuing analysis ([DEIR] Appendix C, 9/02 Transportation Study).
- "2. Market share data used to generate trip distribution estimates ([DEIR] Appendix C, 9/02 Transportation Study).
- "3. Home Depot Parking Study (Barton-Aschman Associates, Parking Demand Study, 1/92 [referenced in DEIR, p. 60]).
- "4. Monthly variation in sales ([DEIR] Appendix C, 9/02 Transportation Study).
- "5. Number and distribution of daily truck trips per day ('based on information from a similar [unspecified] Home Depot store.')
- "6. Number of construction workers at peak: 30-40 per day.
- "7. The increase in daily population on-site by 2,500-3,300 people (75-100 employees, 2,500-3,000 shoppers)." *(Ron Morgan, Bernal Heights Neighborhood Center Community Organizing Coordinator)*

"There seems to be a lot of questioning about what the metrics are, and how the measurements were made. I work across the street at California Public Utilities Commission, and we require applicants there on issues like this to provide the underlying data in electronic format that could be searchable.

The question is, 'What is the underlying data here from which these conclusions here are drawn?'"
(Chris Witteman, Resident)

Response #40

The Home Depot final Transportation Study¹⁵ was prepared following the *Interim Transportation Impact Analysis Guidelines for Environmental Review*, January 2000, prepared by the City and County of San Francisco Planning Department.¹⁶ As discussed in the *San Francisco Transportation Guidelines*, transportation reports may be prepared by qualified consultants. The selected consultant (for this project, Wilbur Smith Associates) met with Planning Department staffs to develop a scope of work for the transportation study. The scope of work included the specific issues to be examined and general assumptions and approach, including the location of analysis intersections and the parking study area boundary. The transportation consultant conducted the required analysis independent of the project sponsor and submitted a draft report for review to the Planning Department, Muni, and Department of Parking and Traffic staff. The City staffs determined whether further refinements were necessary to reflect conditions of the proposed project, and the comments were then incorporated into a revised final report. The transportation consultant's work effort was entirely under the direction of the Planning Department and all submittals were made directly to the City.

Due to the specialized retail use of the proposed project and to most accurately reflect future conditions with the project, information regarding store operations, anticipated market share, and loading demand was obtained directly from Home Depot, instead of standard Planning Department sources and industry standard rates. It should be noted, however, that the traffic counts, parking counts and driveway counts (at other California Home Depot stores, used to estimate trip generation) were conducted by Wilbur Smith Associates (see Response to Comment #41), and the parking demand study and market share analysis were conducted by independent consulting firms, not by Home Depot. All data that was used for the analysis of the project was reviewed and approved by Planning Department staff.

¹⁵ Wilbur Smith Associates, *491 Bayshore Boulevard Home Depot Transportation Study*, September 17, 2002. This report is on file and available by appointment for public review at the San Francisco Planning Department, 1660 Mission Street, Fifth Floor, San Francisco, as part of Case File 2001.0062E!.

¹⁶ The Transportation Study was prepared prior to the availability of the current Transportation Guidelines, which were published in October 2002. However, the current Transportation Guidelines did not contain any changes that would affect the analysis of the project, and therefore does not change the analysis contained in the Home Depot Transportation Report.

Information regarding the monthly variation of sales was provided by Home Depot, and was obtained from daily sales transaction data for multiple stores in California.

Information regarding the number of delivery trucks per day was obtained from Home Depot, who based the data on truck logs from the Colma Home Depot store.

Information regarding construction, including number of construction workers, is typically obtained from the project sponsor, who received estimates from potential construction contractors.

Information regarding daily population was not part of the transportation assessment. Travel demand associated with the proposed project was based on vehicle trip generation rates for the peak hours of analysis.

The above information has been provided to the Planning Department and is available for review by appointment at the San Francisco Planning Department at 1660 Mission Street, Fifth Floor, San Francisco, as part of Case File 2001.0062E!.

Comment #41

"Page 57 [of the DEIR]: Data from the 'four similar Home Depot stores in California' have not been available for review. Members of the public have not been able to review the driveway count data or methodology underlying calculation of the project's trip generation rate. There is no indication how the four samples sites were selected, except that they are either free-standing or with separate entrances/exits for parking, and are located in urbanized areas. Among 1,500 Home Depot stores, 163 of which are in California,¹ there must be many (as well as other large retail outlets) fitting those criteria. It is very possible that selecting a different set of four stores, also meeting the criteria, would produce a different result. No explanation has been provided why the sample was limited to four stores. Limiting the sample to four stores when there is a 32 percent variation from the lowest to the highest trip generation rates (from 5.19 to 6.84²) has produced an average rate that is statistically meaningless.

"In any event, the City has an obligation to conduct independent field counts, if only to verify Home Depot data.

"For similar reasons, the adjustment factor used to calculate peak weekend midday trips (a 50 percent increase over the weekday peak hour) should be based on a larger sample and verified rather than derived from an 8-year-old unverified count conducted at a single store (Colma)." (*Eve Bach, Arc*

Ecology Consultant; Barbara Kyle, Resident/No Depot Committee Chair; and Ron Morgan, Bernal Heights Neighborhood Center Community Organizing Coordinator)

¹ San Mateo County Times, 5/17/03 (on-line version).

² DEIR, page B-5.

Response #41

The trip generation rates were based on a sample of similar Home Depot stores in California. The four stores were selected since they shared common attributes with the project, including access (free-standing or with separate entrances/exits for their parking facilities) and location (within urbanized areas). The stores are located in Campbell, Hollywood, San Jose, and Colma. The stores were selected by the transportation consultant and the Planning Department, the driveway counts were conducted by the transportation consultant, and all findings were reviewed by the Planning Department. These counts were conducted by Wilbur Smith Associates, independent from the project sponsor. It should be noted that the goal of this data collection effort was not to develop a statistically significant trip generation rate for all Home Depot stores, but to augment the information available from national sources such as the Institute of Transportation Engineers (ITE) *Trip Generation* manual.¹⁷ It should also be noted that for a similar land use, "Home Improvement Superstore" land use (#862), ITE's trip generation rates were developed using counts of between one and seven locations. As such, establishing trip generation rates for the project based on four locations would be consistent with the industry standards.

For each of the four locations counted, the number of weekday PM peak hour trips was divided by the size of the store (in terms of 1,000 square feet) to develop trip generation rates. These rates were averaged among the four locations to develop an average trip generation rate (which was used for the analysis of the proposed project).

As indicated on DEIR page 57, the trip generation rates developed for the project, which were based on an average of the four stores counted, were 5.54 vehicle-trips per 1,000 square feet during the weekday PM peak hour, 6.93 vehicle-trips per 1,000 square feet during the weekday peak hour of activity, and 8.28 vehicle-trips per 1,000 square feet during the Saturday midday peak hour. These rates are substantially higher than the standard trip

¹⁷ Institute of Transportation Engineers, *Trip Generation*, 6th Edition, 1997.

generation rates from the ITE *Trip Generation* manual. For a "Home Improvement Superstore" land use (#862), the following trip generation rates were estimated from the ITE information: 2.87 vehicle-trips per 1,000 square feet during the weekday PM peak hour, 3.62 vehicle-trips per 1,000 square feet during the weekday peak hour of activity, and 5.40 vehicle-trips per 1,000 square feet during the Saturday midday peak hour. As such, the higher trip generation rates used in the traffic analysis better reflect the specialized retail characteristics of a Home Depot store than the standard ITE rates.

Comment #42

"Trip Generation Rates are Inconsistent. The transportation study is supposed to look at the travel demand expressed in a trip generation rate, or person-trips per square feet of gross space. The study uses two different methodologies for calculating this information – one for weekday PM peak hours, and another for weekend peak hours. All rates are expressed in vehicle trips, not the requested person-trips. Why did it use different methodologies for these two calculations?

"For the weekday PM peak hours, the study averages driveway counts performed for Home Depots in California four years ago. The undemanding criteria for the selection of these four stores ('either free-standing or with separate entrances/exits for their parking facilities') and location ('within urbanized areas') suggests that a much larger database could have been used. Given the wide range of trip rates among Home Depot stores and the widespread interest in traffic issues by communities throughout the country, it would seem that consistent, statistically valid national and California numbers must be available. Why select just these four (Home Depot has 163 stores in California alone)? Did the City have access to this information? Are the four really the most representative of this situation?

"For the weekend peak hours, the transportation study used counts conducted at the Colma store in the winter of 1995-1996. These data appear to be older, and show lower counts than the data collected in 1999. Why was this different methodology used? Why older data, and why just from one store? No explanation is given." (*Eve Bach, Arc Ecology Consultant; Barbara Kyle, Resident/No Depot Committee Chair; and Ron Morgan, Bernal Heights Neighborhood Center Community Organizing Coordinator*)

Response #42

In general, the standard San Francisco Planning Department methodology for developing the travel demand for a project includes the use of person-trip generation rates. These person-trips are then assigned to the various travel modes (including auto, transit, walk and other modes), and the number of vehicle-trips is determined. However, due to the auto-oriented nature of the goods provided and the typical location of Home Depot stores, very few customers and employees take transit, walk or bicycle to and from the store. As a result, it was assumed that all customer and employee trips generated by the project would be via

private vehicle, and all trips would be vehicle trips, which would result in a conservative estimate of the traffic impacts associated with the project.

Since driveway counts (i.e., the number of vehicles entering and exiting the parking facility) were conducted to develop trip generation rates, and it was assumed that all customers and employees would drive to and from the project, vehicle trip generation rates rather than person-trip generation rates were used to determine travel demand for the proposed project.

See Response to Comment #40 regarding the availability of information used to develop trip generation rates for the proposed project.

The trip generation rates for the weekday PM peak hour, Saturday midday peak hour and weekday peak hour of generation were developed at different times, but essentially used the same methodology for calculating each rate. The driveway counts used to develop the weekday PM peak hour rates were conducted in July 1999, and the counts used to develop the Saturday midday peak hour rates were conducted in the winter of 1995/1996. Both sets of counts were originally conducted for the analysis of previously proposed Home Depot projects within San Francisco. For this project, however, the analysis of Saturday conditions was added to the study scope after the July 1999 counts were conducted. As a result, comparable data were not available. The 1995/1996 counts were used to establish the relationship between the weekday PM and Saturday midday peak hour trip generation. This ratio was applied to the calculated weekday PM peak hour trip generation from the July 1999 data to estimate the Saturday midday peak hour trip generation. The use of ratios between different data sources is a common approach to developing trip generation rates when actual data is not available. Since July has the highest monthly sales, the trip generation rates used in the analysis represent the peak month of activity.

See Response to Comment #41 regarding the selection of the sites used for the driveway counts. It should be noted that the goal of this data collection effort was not to develop a statistically significant trip generation rate for all Home Depot stores, but to augment the information available from national sources, such as the ITE *Trip Generation* manual. The resulting trip generation rates used for the transportation study adequately represent the anticipated travel demand and assessment of impacts associated with the project.

Comment #43

"I think that there were good points made on all sides. Regarding the usage – I live in western San Francisco; I probably still will go, if I use the Home Depot – which I try to avoid whenever possible, but just because it takes a lot longer, and unless you are shopping for a lot of items, it is easier to go to the neighborhood hardware store. But I think a lot of people from my side of the city will continue to go to Colma. Probably what will happen is their business will diminish some, and you will end up with about half the amount of business in the store, and the other half still in the western store, because I think that what is happening is everybody is going to Colma now. Those are the biggest things I find out of here." (*Michael Antonini, Planning Commissioner*)

"Trip Assignment Data Miss Randall Cut-over from San Jose Avenue. In performing the trip assignment analysis, the traffic study anticipates driving routes from different neighborhoods. These data are used in assessing traffic impacts. (Transportation Study, [DEIR] Appendix C.) None of these analyses consider a common traffic pattern from Glen Park, Diamond Heights, Balboa, or outer Noe Valley, where cars use Randall Street to cut across San Jose Avenue, left onto Mission, and then turn right onto Cortland. It is important because it puts more pressure on the intersection of Mission and Cortland, one of the intersections that is projected to degrade to Level of Service (LOS) F." (*Eve Bach, Arc Ecology Consultant; Barbara Kyle, Resident/No Depot Committee Chair; and Ron Morgan, Bernal Heights Neighborhood Center Community Organizing Coordinator*)

Response #43

The assignment of visitor trips to and from the project was based on demographic forecasts of potential customers (see also Response to Comment #44). In general, for each zip code, potential vehicular routes to and from the project were identified, and vehicles were assigned based on the most convenient and direct routes. Using this approach, it was estimated that about 20 percent of the customers would come from the neighborhoods noted by the commenters, including Glen Park, Diamond Heights, Balboa Park and outer Noe Valley neighborhoods. It was assumed that about 30 percent of the trips from these neighborhoods would use Cortland Avenue to access the project site. The routes that were assigned to the street network included the use of Randall Street, San Jose Avenue and Mission Street to Cortland Avenue. As such, the results of the traffic analysis incorporated these trips traveling through the intersection of Mission/Cortland. It should be noted that the intersection of Mission/Cortland would not operate at unacceptable conditions under the Existing plus Project scenario, but under the 2015 Cumulative conditions. Mitigation measures have been proposed to improve intersection operations to acceptable conditions in the future. It should be noted that a new Home Depot store is currently under construction in Daly City (anticipated to be completed in January 2006), and that it could be more attractive for some potential customers from these neighborhoods to travel to Daly City rather than to the

proposed Bayshore Boulevard location. However, the traffic analysis did not consider the new Daly City store, and possibly over-estimates the trips from the neighborhoods that would use Cortland Avenue.

Comment #44

"The DEIR bases its trip distribution/traffic assignment on a study that is not available to the public. The DEIR estimates that 24% of the project's customers will come from San Mateo County based on a study commissioned by Home Depot. We have been denied the opportunity to review the data. There is no indication in the DEIR that the City verified the reported conclusion of the study.

"The assignment of routes appears to be based on speculation: '...traffic was assigned based on the most convenient routes.' What is the basis for the determination that 13 percent of vehicles would choose to approach the project via Cortland Avenue as opposed to 12 percent? Or 20 percent?

"Faulty assumptions for distribution of visitor trips skews data on traffic. The transportation study makes assumptions about where (geographically) the traffic will come from and, therefore, whether it will use freeways or surface streets. The study claims that Home Depot's market research shows that a full 24 percent of the vehicles would come from the South Bay or Peninsula (Transportation Study page 3-4).

"This number is slightly overestimated. While the actual market research data are not provided, it is hard to imagine that many people on the Peninsula would drive past the two Home Depots in Colma or the Lowe's in San Bruno to fight the traffic to drive all the way up to San Francisco to shop at Home Depot on Bayshore Boulevard. We would like to see this market research data. Yet, but using these assumptions, the traffic estimates are skewed towards freeway approaches, not surface approaches to the project. This would lead to understating the traffic impacts on surface routes, a primary concern of neighbors in Bernal Heights. Indeed, the conclusion that only 13 percent of the vehicles would approach from Cortland Avenue is low. And that 15 percent would come from Loomis Street is very high. These assertions should be further studied." (*Eve Bach, Arc Ecology Consultant; Barbara Kyle, Resident/No Depot Committee Chair; and Ron Morgan, Bernal Heights Neighborhood Center Community Organizing Coordinator*)

"I'm also concerned that the draft EIR doesn't adequately address or fully evaluate the kind of – the traffic that comes off of O'Shaughnessy, and then travel – people from the west of Twin Peaks use O'Shaughnessy; travel to Mission; come across Cortland onto Bayshore. People come down Guerrero, then on to Mission, and across Cortland, onto the Bayshore. I don't think people will necessarily circumvent the city in order to get to this proposed store." (*Amy Beinart, Resident*)

"I restored an 1890 house, and I spend a lot of money at Home Depot, so I am not ideologically opposed, and I resent the fact that anybody who would be opposed would be so. I have talked to a lot of my neighbors about this. And I talked to one neighbor who is a contractor, and he says that it is a zoo down there, and he can't imagine it being like this up here. I talked to a lot of supporters, and it is as if they haven't picked up the EIR. Clearly the traffic impacts and the pollution impacts [are] significant. This notion that they will only do it once: You know better than I how many automobiles are registered in San Francisco. What is it; 200,000; 300,000; 400,000? That's a lot of people only doing it once, to start with. If you read *The Tipping Point*, you know if you have a little

street like this, just a small change can have a very big impact. And I think you are seeing some of the emotional responses to this today. This whole notion that people will use the freeway: If I'm going through town I'll use the freeway; if I'm coming east-west, I'm not on 280 or 101." (*Mark Lynch, Resident*)

"I'm a resident of Bernal Heights, 308 Andover Street. I'm not associated with any of the neighborhood groups, nor with Home Depot. I'm speaking with you today to discuss the DEIR, and I find a series of flaws with that, specifically relating to the air pollution issues and traffic. Not only will we have significant increase of traffic. The quoted language of 13 percent increase, in my estimation, is very, very low. Having shopped at the Home Depot in Colma, I have seen many times when it is backed up; the service street is backed up down Junipero Serra, and all the way back up onto the freeway where it is backed up. And these are not just cars idling. These are commercial vehicles; diesel trucks; loud ladders; rattly trucks going through the residential neighborhoods early in the morning, further compounding the traffic problem. I don't feel that this has been fully addressed." (*Robert Mokry, Resident*)

"So 13 percent of Home Depot visits will come via Cortland? Where did you get that figure, out of a hat? It's not just the shakiness of your figures that angers me, but the lack of distinction between types of vehicle. An increase in passenger vehicles might be tolerable, but Home Depot and only Home Depot will generate a flood of contractor's trucks early in the morning – the worst time for Bernal Hill traffic already. Even a big movieplex would be better. At least the traffic would be passenger cars, and most of it would be evening traffic, not early morning." (*Chris Pagels, Resident*)

Response #44

Home Depot hired an independent market research firm to estimate the geographic location of potential customers of the project. The firm that conducted this analysis is composed of professional demographers, providing Home Depot with demographic information on existing and proposed stores. They combine standard demographic industry standards with actual data collected from other existing Home Depot stores to perform the market analysis. The market research data used in the analysis is available for review by appointment at the Planning Department, at 1660 Mission Street, Fifth floor, San Francisco as part of Case File 2001.0062E!. For a specialized land use, such as a Home Depot store, the use of market research data allows for a more accurate determination of travel characteristics than the standard trip distribution rates established in the *San Francisco Transportation Guidelines*. Comparison of the trip distribution from the market research analysis versus distributions from the *San Francisco Transportation Guidelines* is as follows:

<p>Table C&R.2 Trip Distribution Comparisons by Superdistrict</p>		
Origin/Destination	San Francisco Transportation Guidelines	Market Research Analysis Data
Superdistrict 1	4%	6%
Superdistrict 2	8%	9%
Superdistrict 3	59%	61%
Superdistrict 4	5%	5%
Outside of San Francisco	24%	19%
Total	100%	100%

In general, the trip distribution rates developed from the market research analysis are similar to those established in the *San Francisco Transportation Guidelines* for retail uses in this quadrant of the city, except that the market research analysis does not assume any customers from the North Bay or East Bay due to the location of other Home Depot stores. Therefore, the analysis contained in the DEIR would be consistent with the *San Francisco Transportation Guidelines*.

As described in the DEIR on page 59, the geographic location of potential customers was determined at a zip code level. The analysis accounted for the characteristics of the proposed store and the surrounding population. The characteristics of the proposed store included the location of other Home Depot stores (such as the stores in Colma and San Mateo) and the location of nearby competitors. The characteristics of the surrounding population (at the zip code level) included the average distance to the store, number of dwelling units, percentage of units that are owner occupied, and median income.

Overall, it was estimated that about 76 percent of the customers would be from San Francisco and 24 percent from the Peninsula (primarily within Brisbane, Daly City, and South San Francisco). Although it was estimated that there would be a portion of residents in northern San Mateo County who would continue to use the existing Colma Home Depot store, the market research information estimated that the proposed project on Bayshore Boulevard would be more convenient for residents located along U.S. 101 and near the San Francisco and San Mateo county line.

Based on this geographic distribution of customers, the project-generated trips were assigned to the local and regional roadway network. In consultation with Planning Department staff, the transportation consultant identified potential vehicular routes to and from the project for each zip code, and vehicles were assigned based on the most convenient and direct routes. In many cases, multiple routes were selected between each zip code and the project site.

It was estimated that a portion of the residents within the following zip codes would use Cortland Avenue to travel to and from the project site: 94110 (Mission and Bernal Heights), 94112 (Balboa Park, Ingleside, and Excelsior), 94132 (Lake Merced and Lakeshore), 94131 (Twin Peaks, Diamond Heights, and Glen Park) and 94127 (West Portal, St. Francis Wood and Miraloma). Overall, these trips would represent about 13 percent of the total activity to and from the proposed project.

Since Cortland Avenue is a narrow street, with STOP signs, grade changes and relatively slow traffic, it was assumed that drivers from other areas would tend to use other east/west roadways, such as Cesar Chavez Street and Alemany Boulevard, when possible. As compared to these two streets, Cortland Avenue has substantially lower existing traffic volumes during both the weekday PM and Saturday midday analysis periods, reflecting its function as a local collector street. Pages 61 through 68 of the DEIR present the results of the analysis of traffic conditions at the study intersections, including a queuing assessment. While delays along Cortland Avenue would increase with the additional traffic generated by the proposed project, all intersections would continue to operate at intersection level of service (LOS) D or better and, as such, queuing similar to that described by the commenter at the Colma Home Depot is not anticipated to occur. (See Response to Comment #64 for a discussion of LOS methodology.)

Page 59 of the DEIR presents the distribution of vehicles in the immediate vicinity of the project site. The trip assignment does not assume that 15 percent of the project customers would use Loomis Street as their primary access route to and from the project. Instead, it was estimated that 15 percent of the customers would use the driveway located on Loomis Street to enter and exit the project site (the remaining 85 percent would use the other driveways on Bayshore Boulevard and Waterloo Street). A portion of the trips to/from the

east (i.e., from Bayview Hunters Point) and to/from Alemany Boulevard would use the Loomis Street driveway, because it would be more direct and convenient than the Bayshore Boulevard and Waterloo Street driveways.

Only long-distance trips were assumed to use I-280 or U.S. 101 to travel to and from the project, including trips to/from southwestern and northeastern San Francisco and the Peninsula. Overall, it was estimated that less than 25 percent of the trips generated by the project would use I-280 or U.S. 101 as the primary access route to and from the project.

Information on the types of vehicles that would travel to and from the project is not available; however, the vehicle mix would include private autos and commercial vehicles, including contractor and delivery trucks. The intersection operations analysis assumed a vehicular mix (autos versus trucks) similar to existing conditions at the study intersections. The project's vehicular mix during the PM peak hour of analysis is anticipated to be similar to existing conditions, and as such the impact analysis need not be affected.

Comment #45

"Pages 73 and 75 [of the DEIR]: The conclusion that delivery and construction vehicles will use U.S. 101 or I-280 is not supported with evidence or analysis. The assumption that delivery and construction vehicles will approach the project from the two closest freeway exits does not take into account the terrible congestion during much of the day in both directions on these freeways." (*Eve Bach, Arc Ecology Consultant; Barbara Kyle, Resident/No Depot Committee Chair; and Ron Morgan, Bernal Heights Neighborhood Center Community Organizing Coordinator*)

Response #45

Typically, Home Depot trucks make deliveries to several stores in a row. As such, they would usually come from or go to other stores on the Peninsula. For these trips, using U.S. 101 and/or I-280 would be the most convenient and direct route. In addition, most of the delivery activity at Home Depot stores occurs during non-peak periods (such as between 10:00 a.m. and 1:00 p.m., or overnight), during which time conditions on the freeway network are less congested.

Approximately 40 percent of Home Depot deliveries are made by Home Depot-controlled trucks; the remainder are made by individual vendors. The project sponsor has committed to

developing access routes for all Home Depot-controlled trucks that would entail a minimal use of city streets.

Similarly, the construction-related trucks that would come from the Peninsula/South Bay would likely use U.S. 101 or I-280 due to the length of the trip (note that trucks that would travel within San Francisco would likely use local streets). Construction activities are anticipated to occur between 6:00 a.m. and 5:00 p.m., but the project sponsor may work with the construction contractor and subcontractors to limit construction trips to non-commute hours. Overall, most construction-related activity would likely occur during the middle of the day, during which time conditions on the freeway network are less congested.

The project sponsor has committed to work with the construction contractors and subcontractors to develop a routing plan that entails a minimal use of city streets. The project sponsor would work with the Committee for Utility Liaison on Construction and Other Projects (CULCOP, the City's construction committee) to identify truck routes for the construction activity and inform the adjacent neighborhoods of the truck routes established. When developed, this information will be available for public review at the appropriate City agencies. It should be noted that in San Francisco, construction-related impacts are generally not considered significant due to their temporary and limited duration.

Comment #46

"Page 57: The DEIR must assess daily traffic conditions as well as weekday and weekend peak hour conditions. Increased daily traffic represents a potentially significant impact of the project for all vehicles that could be greater than peak hour impacts alone. Congestion within Bernal Heights is spread across most of the day. About 30 percent of Home Depot customers were estimated to be 'professional contractors' by a Home Depot official during a zoning hearing for a Home Depot in Warrenton, Virginia.¹ Contractors would not generally make trips to Home Depot in the evening.

"It also appears that truck traffic generated by the project could occur at night, according to the Home Depot Annual Report for 2002 that references '...our new in-store Service Performance Improvement (SPI) initiative, in which our stores handle and receive inventory at night...' Traffic and nighttime noise impacts over the entire day must be analyzed." (*Eve Bach, Arc Ecology Consultant; Barbara Kyle, Resident/No Depot Committee Chair; and Ron Morgan, Bernal Heights Neighborhood Center Community Organizing Coordinator*)

¹ *The Fauquier Citizen* (Fauquier County, Virginia).

Response #46

The *San Francisco Interim Transportation Impact Analysis Guidelines for Environmental Review*, which present the framework for conducting transportation impact analyses, focus on the potential impacts of a project during the weekday PM peak hour. In general, daily traffic volumes are not considered in terms of transportation impact analysis. As discussed on pages 57 through 59 of the DEIR, traffic conditions during the weekday PM peak hour are assessed since they represent the worst conditions of the local transportation network. However, since Home Depot stores usually generate more traffic on weekends than weekdays, an additional Saturday midday peak hour analysis was also conducted. At other times, the traffic volumes on the adjacent streets would be lower, or the project would generate fewer vehicle-trips. As such, this analysis addresses the highest potential impacts associated with the project. During the weekday PM and Saturday midday peak hours, the DEIR found that the project would not result in any significant traffic impacts. As a result, it was concluded that the project would not result in any significant traffic impacts during other periods. For analysis of noise impacts, refer to Response to Comment #127.

It should be noted that the weekday peak hour of activity for land uses similar to the project typically occurs during the middle of the day. Although the project would generate more vehicles during this peak hour of activity (about 25 percent higher than during the PM peak hour, as discussed on page 58 of the DEIR), the traffic volumes at the surrounding intersections are lower during this hour than during the PM peak hour. As a result, it is assumed that intersection operating conditions during the peak hour of activity would be equal to, or better than, conditions during the weekday PM peak hour.

The transportation analysis conducted for the project addresses the potential impacts to the local street network in the vicinity of the project site, including several study intersections along Bayshore Boulevard and Cortland Avenue. It was found that the additional vehicles generated by the project would not significantly impact the operating conditions at the study intersections, and would not result in substantial congestion or degradation in conditions along the nearby streets.

According to Home Depot, stores typically are open weekdays and Saturdays 6:00 a.m. to 10:00 p.m. and Sundays 7:00 a.m. to 8:00 p.m. In the future, the proposed store may be open

24-hours. Contractors generally visit the store during the early morning – typically before 8:00 a.m. In addition, Home Depot estimates that a portion of the deliveries to the project would occur overnight and in the early morning. However, these trips combined would not generate more trips than the project during the weekday AM peak hour, and therefore would not result in any significant traffic impacts. See also Response to Comment #48 regarding the analysis of weekday AM peak hour conditions, and Response to Comment #45 for more detailed discussion of truck delivery routes.

Comment #47

"The problem is compounded by the fact that many of the workers will be part-time, resulting in a greater number of trips to and from the site per day. In a new store in Ithaca, New York, 40 percent of the jobs will be part-time.¹ The other complicating factor is that the store operates seven days a week for more than one 8-hour shift (this obviously needs to be factored into the air quality analysis).

¹ Ithacajournal.com, April 25, 2003.

"The EIR must demonstrate that the EIR uses a trip generation rate that accounts for *all* employees – permanent, temporary, probationary, full-time, and part-time – and everyone else who travels to and from the site." (*Eve Bach, Arc Ecology Consultant; Barbara Kyle, Resident/No Depot Committee Chair; and Ron Morgan, Bernal Heights Neighborhood Center Community Organizing Coordinator*)

Response #47

The travel demand for the project was based on driveway counts conducted at four similar Home Depot stores throughout California, which included both visitors and employees of each store. The four stores were selected since they shared common attributes with the proposed project, including access (free-standing or with separate entrances/exits for their parking facilities) and location (within urbanized areas). As such, the trip generation rates used in the analysis would incorporate all employee-related trips during the PM peak hour (whether part-time or full-time employees), and separate trip generation calculations for employee trips were not necessary. Based on information provided by the project sponsor, about 35 percent of the employees at the proposed store would be part-time employees (as discussed in Response to Comments #36).

See Responses to Comments #115 through #126 for the discussion and analysis of air quality.

Comment #48

"And the busiest traffic period for this intersection, the morning commute hour, was not even studied at all." (*Eve Bach, Arc Ecology Consultant; Barbara Kyle, Resident/No Depot Committee Chair; and Ron Morgan, Bernal Heights Neighborhood Center Community Organizing Coordinator*)

"There was no study of morning rush hour patterns and whether the early opening of the store and its use by contractors will coincide with the morning commute. Bayshore Boulevard becomes very slow in the morning commute hours and is sure to be affected by added vehicular traffic." (*Nic Griffin, Resident*)

"I used to be able to look out my back window, and look down on the old Goodman's, so go down Bradford Street and I get to Cortland Street. I would say the worst traffic on Cortland Street is between 6:00 and 7:30 in the morning, and that's commuters from Bernal Heights who are going down Cortland Street and onto Bayshore Boulevard." (*Robert Heacock, Resident*)

Response #48

A supplemental analysis (documented in a technical memorandum titled *491 Bayshore Boulevard Home Depot – AM Peak Hour Conditions*, Wilbur Smith Associates, January 8, 2004)¹⁸ was conducted to determine weekday AM peak hour intersection operating conditions for three key intersections in the vicinity of the project site: Bayshore/Industrial/Alemany, Bayshore/Cortland, and Mission/Cortland. These intersections were selected since they would most likely be affected by spillover congestion from the freeways and would provide a general characterization of conditions to and from the Bernal Heights area.

Turning movement counts were conducted on Tuesday, October 14, 2003, during the weekday AM peak period (6:30 to 9:00 a.m.) for the three study intersections, and intersection LOS were developed for the peak hour of the peak period (generally 7:30 to 8:30 a.m.). During the weekday AM peak hour, the intersection of Bayshore/Cortland operates at LOS C, the intersection of Bayshore/Industrial operates at LOS D and the intersection of Mission/Cortland operates at LOS C.

In addition, field observations were performed throughout October 2003 at the study intersections and along Cortland Avenue to determine how the streets and intersection approaches currently function during the morning commute period. Currently, all three study

¹⁸ This document is on file and available for public review by appointment at the San Francisco Planning Department, 1660 Mission Street, Fifth Floor, San Francisco, as part of Case File 2001.0062E!.

intersections have relatively low average delays per vehicle. Although some specific approaches and movements were observed to have congestion and additional vehicular delays (such as the northbound left-turn movement at Bayshore/Cortland, the eastbound approach at Bayshore/Industrial and the southbound left-turn movement at Mission/Cortland), conditions at these locations did not substantially affect intersection operations and the problems did not extend for a long duration. Along Cortland Avenue, between Bayshore Boulevard and Mission Street, traffic generally flowed without major delays or impedance, and travel speeds were relatively slow due to the grade changes, frequent STOP signs, narrow street right-of-way and bus operations, not due to excessive traffic volumes.

The weekday AM peak hour intersection operating conditions were also compared to the weekday PM peak hour conditions developed for the DEIR, as a means to qualitatively assess morning operating conditions with the project. Under existing weekday PM peak hour conditions, the intersection of Bayshore/Cortland operates at LOS C, the intersection of Bayshore/Industrial operates at LOS D and the intersection of Mission/Cortland operates at LOS B. The PM peak hour LOS operating conditions are similar to those calculated for the weekday AM peak hour, except for the intersection of Mission/Cortland, which operates at LOS C during the AM peak hour.

To estimate the travel demand associated with the project during the weekday AM peak hour, data from the ITE *Trip Generation* manual was used (new driveway counts at other Home Depot stores were not conducted). For a "Home Improvement Superstore" (ITE land use #862), the trip generation of the AM peak hour is approximately half the trip generation of the PM peak hour. The trip generation reflects the early opening and long hours of stand-alone (i.e., not part of a retail complex) home improvement stores such as the proposed Home Depot. It was estimated that the project would generate about half the number of vehicle-trips during the weekday AM peak hour as during the weekday PM peak hour, as documented in the DEIR. As discussed in the DEIR, the project would not have any significant traffic impacts during the weekday PM peak hour. Since the intersection operating conditions for the weekday AM peak hour and PM peak hour are similar, and since the project would generate substantially fewer trips during the weekday AM peak hour than during the PM peak hour, it was anticipated that the project would also not result in any significant traffic impacts during the weekday AM peak hour even at the intersection of

Mission/Cortland (when conditions are slightly better in the PM peak hour than during the AM peak hour).

Comment #49

"The baseline traffic counts are very low in comparison to historic traffic on Bayshore Boulevard. The most recent counts reflect a very slow economy in San Francisco, and [the volume of through traffic] on Bayshore [is] in many cases more than 10 percent under comparable data collected two years ago." (*Charles M. Abrams, President, Abrams Associates*)

"In addition, the Transportation Study understates traffic volumes on U.S. 101 as 220,000 vehicles per day in 2000.¹ The correct figures for 2000, 2001, and 2002 are in the range of 250,000 to 270,000." (*Eve Bach, Arc Ecology Consultant; Barbara Kyle, Resident/No Depot Committee Chair; and Ron Morgan, Bernal Heights Neighborhood Center Community Organizing Coordinator*)

¹ Transportation Study, 9/17/02, page 2-1.

"Pages 44 to 48 [of the DEIR:] Traffic Operating Conditions - The base period for the traffic counts is during a recession. During the period 1999-2000, when the dotcom boom was in full swing and when commercial spaces were occupied in the South of Market, Potrero Hill, and Mission neighborhoods, there was substantially more traffic in the Potrero/Bayshore corridor. The current traffic counts are based on vacant commercial buildings and a dramatic drop in employment in that area. Potrero and Bayshore are used as spillover routes to access 101, 280, and eastern neighborhoods when 101 and 280 are congested. Traffic counts done in that area in the 1999/2000 period show that congestion.

"Does this EIR assume that those spaces will never be reoccupied and that the current recession will continue for 5 years? 10 years? To 2015? For another generation?

"If that is not the assumption, traffic levels must be adjusted to include occupancy in the building which are currently vacant. This is not new construction, but buildings which are already constructed, for which no further environmental evaluation will be required, and for which conditions and impacts will change simply by tenants moving in.

"Were there identifiable trends in levels of traffic in the spring 2001, fall 2001, and winter 2002 measurements?" (*Sue C. Hestor, Attorney at Law, on behalf of Cole Hardware*)

"On the other hand, the Office Max has been shut down for quite some time, and there is an antique store on the other side. So I think the Office Max is something else now; I think there would be less impact there." (*Bill Lee, Planning Commissioner*)

Response #49

Traffic counts were conducted by the transportation consultant in the spring of 2001, fall of 2001, and winter of 2002. Overall, these counts were relatively consistent and did not indicate any substantial changes to the street volumes over the two-year period. It should be noted that the traffic volume counts along Bayshore Boulevard were conducted after the

existing uses on the project site (Goodman's Lumber and Whole Earth Access) were closed, but when the nearby OfficeMax store at 625 Bayshore Boulevard was still in operation.

At the time the analysis for the DEIR was conducted, the Planning Department had not received any project information or future development plans for any site along this portion of Bayshore Boulevard, including the now-vacant OfficeMax site.

The traffic analysis (for all analysis scenarios) does not assume that any of the vacant parcels in the vicinity of the project site would never be reoccupied in the future. The existing conditions, as documented in the study, reflect the traffic and roadway conditions that are currently present, and do not include potential reuse of vacant buildings in the area. The future growth in activity, whether it be from the reuse of vacant buildings or new development, is addressed in the analysis of the 2015 Cumulative conditions. These conditions include a substantial increase in traffic volumes along the major streets and freeways in the area (an average of one percent per year) that would include the potential of new development or reuse of nearby buildings.

The daily traffic volumes on U.S. 101 and I-280 were obtained from Caltrans. In 2000 (when the DEIR was initiated), the average daily traffic on U.S. 101 at the junction of I-280/Alemany was 221,000 vehicles. In subsequent years, Caltrans has report average daily traffic volumes of 224,000 vehicles in 2001 and in 2002 (a variation of less than 1.5 percent, and within the daily variation of traffic volumes). As such, the values presented in the Transportation Study are consistent with current conditions.

Comment #50

"Page 59: The DEIR does not substantiate its claim that the trip generation rate used is higher than the ITE rate would be. The DEIR makes the claim that it is using a higher rate than the ITE rate for a 'similar land use,' but does not tell us what that 'similar' land use is and what the ITE rate is. This is another example of a conclusion that has not been documented." *(Eve Bach, Arc Ecology Consultant; Barbara Kyle, Resident/No Depot Committee Chair; and Ron Morgan, Bernal Heights Neighborhood Center Community Organizing Coordinator)*

Response #50

As documented in the Transportation Study (Page 3-3), the ITE *Trip Generation* manual¹⁹ includes a "Home Improvement Superstore" land use (#862). For this use, ITE has estimated that there would be 2.87 vehicle-trips per 1,000 square feet during the weekday PM peak hour, 5.40 vehicle-trips per 1,000 square feet during the Saturday midday peak hour, and 3.62 vehicle-trips per 1,000 square feet during the weekday peak hour of generator (the hour during the week which has the highest activity level). These trip generation rates are 50 to 100 percent lower than those used to determine the potential impacts associated with the project. As described in Response to Comment #42, the trip generation of the project was based on driveway counts conducted at similar Home Depot stores in California, and was estimated to be 5.54 vehicle-trips per 1,000 square feet during the weekday PM peak hour, 8.28 vehicle-trips per 1,000 square feet during the Saturday midday peak hour, and 6.93 vehicle-trips per 1,000 square feet during the weekday midday peak hour.

Comment #51

"I've read the EIR cover to cover and found it inadequate. It claims traffic levels on Cortland are acceptable now, and they aren't.

"The raw numbers are wrong. The traffic counter nearest our house was on Cortland between Prentiss and Banks. It was sabotaged during the count. I found its cord in the gutter. Not knowing how important these estimates would turn out later to be, I just re-strung it across the traffic. I assumed it was a kids' prank. But if other sensors were also vandalized, the undercount for all of Cortland could be serious.

"I live at Cortland & Prentiss. Just below us on the hill, Cortland bends abruptly. Many trucks already come up the hill, barely make the curve, and stop in front of our house, then backup into our narrow side-street, beeping and belching soot - using us as a turn-around. Then go back down the hill. These aren't lost drivers - it's the same lines & trucks, over and over. You've been assuming that most truck traffic, if it uses Cortland at all, stops close to Bayshore at the businesses at the foot of the hill. But this may not be true. A larger proportion of Cortland's traffic than you think is trucks already, at least at our corner. Again, we're just below the Bank Street counter, so these visits (and their constant noise and soot) wouldn't have registered except as traffic at the foot of the hill." (*Chris Pagels, Resident*)

Response #51

The traffic volume counts conducted for the transportation study were performed manually, with count technicians stationed at each intersection. No automatic 24-hour traffic counters were used. Any problems with automatic traffic counters placed on Cortland Avenue for a

¹⁹ Op cit.

different study would not affect the data and results of the traffic analysis contained in the DEIR.

According to information in the *South Bernal Heights Traffic Calming Study, Final Report*,²⁰ approximately 3 to 7 percent of daily traffic volumes on Cortland Avenue are heavy vehicles (including trucks, buses and other multi-axle vehicles). The highest volume of heavy vehicles on Cortland Avenue was reported between Peralta Avenue and Bayshore Boulevard, due to the concentration of warehouses and industrial buildings at the eastern end of the street.

See Responses to Comments #67 through #70 regarding general traffic conditions on Cortland Avenue.

Comment #52

"Page 34 [of the DEIR:] Does the patronage/traffic assumptions for this store assume a shift of the business currently handled in neighborhood shopping areas to this Home Depot? How much of a shift? How has this affected increases of traffic out of the neighborhood shopping area to Bayshore and Cortland? If the assumptions do not include such a shift, what would be the effect, particularly on increased traffic, if Home Depot undercut (at least for a time) neighborhood hardware, nurseries, and home improvement stores such that most of them went out of business?" (*Sue C. Hestor, Attorney at Law, on behalf of Cole Hardware*)

"The DEIR fails to consider the additional traffic that will be caused by the closure of neighborhood home supply stores. Due to the size of its corporation – which allows the stores to charge significantly lower prices – the openings of Home Depot stores inevitably cause the closure of smaller, neighborhood stores with which Home Depot competes. The customers who were once able to shop in their own neighborhoods are then forced to drive to Home Depot. For example, if Cole Hardware on Mission Street is forced out of business by the project, those of us who now walk there will be forced to drive to Home Depot, because it is too far to walk. These closures of neighborhood stores will cause a significant amount of additional traffic, in turn causing additional air pollution, noise, and adverse impacts to pedestrians, none of which were considered by the DEIR." (*Jeff Hoffman, Resident*)

Response #52

The trip generation rates used for the analysis of the project were based on actual driveway counts conducted at other Home Depot stores throughout California. It is anticipated that these counts would include all types of trips, including those from other hardware stores in

²⁰ City and County of San Francisco, Department of Parking and Traffic, *South Bernal Heights Traffic Calming Study, Final Report*, November 2002.

the vicinity, were such trips to occur. All trips generated by the project were assumed to be via automobile, and therefore were included in the traffic, air quality, pedestrian, and other impact analyses. It should be noted that the market research analysis was conducted by an independent firm for Home Depot and was used to determine the distribution of trips accounted for the location of competitor stores.²¹ See Response to Comment #44 regarding how market research data was used in the analysis.

At this time, the nearest local hardware store (Cole Hardware) is located on Mission Street, near 29th Street. There are a number of home improvement and contractor supply stores along Bayshore Boulevard, including the Floorcraft Garden Center (a garden store/nursery/carpet store), located at 550 Bayshore Boulevard (directly west of the project site), the Kitchen and Bath Expo at 390 Bayshore, the Marble, Granite, Tile store at 368 Bayshore and Golden Gate Interiors at 362 Bayshore. South of the project site, the Bayshore Builders Supply is located on Loomis Street, Best Tile at 625 Bayshore, and GGI Natural Stone at 615 Bayshore. It may be possible that customers to these sites decide to patronize the proposed project. As indicated above, the trip generation accounts for all anticipated trips to the project. If other businesses in the area were to close due to the presence of the project, there would be a reduction in the traffic volumes destined to and from these establishments. However, the number of trips generated by the project would not change and would not change the conclusions reached in the DEIR.

For discussion of business displacement, see Responses to Comments #153, #24, and #28.

Comment #53

"The transportation study prepared for the Draft EIR is based on several 'worst case' assumptions, each one compounding the next, and uses calculations and assumptions derived in an overly conservative manner. The result is an extreme scenario that is very unlikely to happen. This is an effective method to use in preparing the Draft EIR, as it leads to the identification of every traffic impact that could possibly occur, but in reality the traffic impacts of the store will likely be far less intense. Our analysis of these issues is based on a peer traffic review conducted by Overland Traffic Consultants (the 'Overland Study'), a copy of which is attached as Exhibit A to this letter. [Refer to Appendix E of this document, Anna C. Shimko Letter dated July 11, 2003.] The Overland Study presents and employs more realistic assumptions to analyze the 'real world' traffic effects of the

²¹ The market research data used in the analysis is available for review by appointment at the Planning Department, at 1660 Mission Street, Fifth floor, San Francisco as part of Case File 2001.0062E.

project. The Overland Study finds that the Draft EIR overestimated traffic volume by approximately 20%. The revised, more realistic traffic volume for the site would result in shorter waits at intersections, and, most significantly, no increase in density levels on the freeway ramp junctions currently at Level of Service F. This means that the project will have no significant and unmitigable impacts at freeway ramp junctions." (*Anna C. Shimko, Attorney at Law for Home Depot*)

Response #53

The transportation study followed standard San Francisco Planning Department approaches and methodologies for determining project travel demand and analyzing impacts of the project, and includes a number of conservative assumptions (e.g., that all employees would drive alone to the project and that all project-generated trips would be via automobile). Although it is possible that there would be fewer vehicle-trips traveling to and from the project site, as suggested in the Overland Study, the reduction would likely not be substantial enough to change the future freeway ramp and intersection operating conditions, and it is anticipated that the project would continue to have significant contribution to all freeway on-ramp locations that were identified as operating at LOS F under 2015 Cumulative conditions (see DEIR pages 79 through 81).

TRAFFIC CALMING STUDY

Comment #54

"Traffic Calming Studies Finds Hotspots, But DEIR Ignores Them. While the DEIR claims that traffic on Cortland and other residential streets is relatively light, the City's Department of Parking and Traffic found enough traffic problems in Bernal Heights to perform a Traffic Calming Study. The Traffic Calming Study identified many issues of concern along Cortland Avenue: cut-through traffic along the entire street between Bayshore Boulevard and Mission Street; collision hot-spots at many intersections along Cortland; and congestion at the intersections of Cortland/Andover and Mission/Cortland. It found similar problems at the intersection of Alemany/Putnam/101 southbound off-ramp.

"The Traffic Calming Study's figures on total collisions at various intersections between 1995 and 1999 are somewhat alarming. The worst intersection, at Crescent Avenue and Alemany Boulevard, has seen 54 collisions during this four-year period, which caused injuries to 58 people. Twenty-three collisions at Cortland and Mission caused 26 injuries. These findings suggest that the simple LOS assignments to intersections do not portray the complete picture of the actual traffic situation in a neighborhood." (*Eve Bach, Arc Ecology Consultant; Barbara Kyle, Resident/No Depot Committee Chair; and Ron Morgan, Bernal Heights Neighborhood Center Community Organizing Coordinator*)

"Bernal Heights is a neighborhood that is severely constrained by its physical characteristics. There are few through streets because of the constraints of the hills on which it sits. The only street that goes through the neighborhood from east to west is Cortland Avenue. This is also the business and pedestrian center of the neighborhood, and is a key gathering place. Traffic problems on Cortland Avenue have already been documented, and the City has designed in conjunction with the neighborhood and is carrying out traffic calming plans." (*Amy D. Kyle, Ph.D., M.P.H., Resident*)

"The city recently did a traffic calming study for the South Bernal Heights area. The information and suggestions from that report should be incorporated into this traffic report. I am concerned that we will see more accidents on Crescent and Cortland because there are not enough pedestrian-friendly crosswalks. The recommendation[s] of the traffic calming report are desperately needed. The Home Depot project would increase our neighborhood's concerns." (*Amy C. Miller and Virginia Bowen, Residents*)

"I work at Bernal Heights Neighborhood Center, and just a couple of comments. There have been a lot of comments made regarding the traffic and environmental impact report. One point – actually two points that I would like to make are first, regarding the Department of Parking and Traffic's detailed traffic-calming study that was made in the Bernal Heights neighborhood: It was a very comprehensive study, and Bernal Heights neighborhood was made a pilot project by the Department of Parking and Traffic, partly because of activism from the neighbors in Bernal Heights, and partly because there was a significant traffic impact and subsequent pedestrian safety impact in Bernal Heights currently. And the Department of Parking and Traffic's traffic calming study and subsequent recommendations for modifying the routing and making provisions for mitigating the current impacts has not been referenced in the DEIR. It needs to be. It actually kind of goes both ways. One is the increased traffic from the store, it needs to be evaluated how the increased traffic impacts pedestrian safety. And conversely, once there are mitigations made because of the traffic-calming measures, those will additionally impact the way traffic flows through the Bernal Heights neighborhood. So it goes both ways. So that will actually impact the way that people get to the store through the neighborhood." (*Joseph Smook, Resident*)

"I attended the Traffic Calming meetings last year at the Bernal Heights Neighborhood Association, and I must say not only have we not had positive change as a result of that, but now we have this Home Depot plan which is bound to add to our traffic congestion and air pollution. There is obviously already a problem on Bernal that the Traffic Calming study was initiated. Now we will have thousands more vehicles – mostly trucks and larger types – trying to use Cortland as a driveway into Home Depot." (*Jennifer Ware, Resident*)

Response #54

As indicated in the DEIR on page 50, the results of the Bernal Heights Traffic Calming Project, as documented in the *South Bernal Heights Traffic Calming Study, Final Report*, (November 2002), were incorporated into the transportation study. Along Cortland Avenue, the study identified the following concerns: cut-through traffic between Mission and Bayshore Boulevard, a high-collision location at the intersection of Cortland/Mission, and congestion at the intersections with Andover Street and Mission Street. To address these issues, the study recommended the installation of center islands, new

crosswalks, high-visibility crosswalks, curb bulb-outs and textured intersections along the street. At the intersection of Crescent/Putnam/Alemany/U.S. 101 southbound ramps, the study proposed installation of a traffic island and marking and signing crosswalks to improve pedestrian conditions. These street improvements would reduce the effect of traffic on pedestrians and bicyclists, and reduce travel speeds and cut-through traffic on local streets, but would not be significant enough to cause a substantial amount of traffic to divert to other streets. The improvements identified in the study are being implemented by DPT over the next couple of years. It should be noted that no improvements were proposed for the intersections of Mission/Cortland and Bayshore/Cortland.

The study found that while Cortland Avenue did have localized traffic congestion, the traffic volumes were generally not excessive on streets within the South Bernal Heights area, and much of the traffic is locally generated. The study evaluated collision data in the South Bernal Heights area for a four-year period between 1995 and 1999, and identified intersections along Alemany Boulevard, Mission Street and Patton Street as collision hotspots. No intersections along Cortland Avenue between Mission Street and Bayshore Boulevard were identified as collision hotspots in the Study. Only one intersection on Cortland Avenue was identified as among the ten intersections in the area with the most reported collisions (total of 23 collisions at Cortland/Mission during the four year period). Of the ten intersections within the South Bernal Heights area with the most pedestrian collisions, there were four locations on Cortland Avenue: Cortland/Mission (with eight pedestrian collisions), Cortland/Ellsworth (with three pedestrian collisions), Cortland/Bradford (with two pedestrian collisions) and Cortland/Andover (with two pedestrian collisions). Two of the analysis study intersections were included in the list of the top ten collision locations in the area: Cortland/Mission (23 collisions) and Crescent/Putnam/Alemany (54 collisions). Review of the most-recent five-year accident data for these intersections indicates that the number of accidents has decreased. Between 1998 and 2003, the number of accidents at the intersection of Crescent/Putnam/Alemany was 21 (none of which involved pedestrians or bicyclists), and the number of accidents at the intersection of Cortland/Mission was 11 (of which one involved a pedestrian and two involved bicyclists).

The DEIR acknowledges that Cortland Avenue provides a connection between Mission Street and Bayshore Boulevard, and that some project-generated trips would use the street.

However, the project would not add a significant amount of traffic to Cortland Avenue – about 106 vehicles during the weekday PM peak hour and 159 vehicles during the Saturday midday peak hour. Since traffic volumes on the street are relatively low (about 750 vehicles during the weekday PM peak hour and 700 vehicles during the Saturday midday peak hour), the increase in traffic volumes due to the project would not substantially worsen the operating conditions of the intersections along the street (as indicated on page 49 of the DEIR). As a result, the project would not invalidate the results of the *Traffic Calming Study*. Implementation of the measures included in the Study may serve to discourage project-generated trips from using Cortland Avenue, and instead to use the major streets, such as Cesar Chavez Street, to access Bayshore Boulevard.

Recently, enhancements to the pedestrian conditions at the intersection of Bayshore/Cortland have been implemented, such as new pedestrian signals with countdown indicators (WALK/DON'T WALK indicators that present the time remaining to cross the street). In addition, as part of the project, the amount of pedestrian crossing time at the intersection of Bayshore/Cortland would be increased with the proposed signal timing plan for the intersection. DPT has conducted an initial assessment of the appropriateness of installing new sidewalk bulb-outs at the corners of the intersection of Bayshore/Cortland, and has determined that a bulb-out would not be feasible at the northwest corner and that additional study would be required to determine the appropriateness of bulb-outs at all other corners.²²

TRAFFIC ANALYSIS

General

Comment #55

"Page 56 [of the DEIR:] Please explain how traffic loops around on Bayshore and Hilton to Cortland and how that loop serves both the Floorcraft Garden Center, other businesses, and the Muni. How will service on that loop be impeded by backed up traffic on Cortland?" (*Sue C. Hestor, Attorney at Law, on behalf of Cole Hardware*)

²² Letter from Bond Yee, Director of the Department of Parking and Traffic to Tim Erney, Wilbur Smith Associates, September 7, 2004. This letter is on file and available by appointment for public review at the San Francisco Planning Department, as part of Case File 2001.0062E!.

Response #55

Currently, vehicles are able to turn right from southbound Bayshore Boulevard (south of Cortland Avenue) to Hilton Street as a way to return to Cortland Avenue. Hilton Street is located about 150 feet from Bayshore Boulevard and is a one-way northbound street and provides access to the back-of-house functions for the Floorcraft Garden Center at 550 Bayshore Boulevard, and therefore has extremely low traffic volumes. In addition, the Muni 24-Divisadero eastbound route is sometimes truncated at Hilton Street (instead of continuing to Third Street), including during its owl runs (1:00 a.m. to 5:00 a.m. service).

Vehicles exiting Hilton Street are required to turn left or right onto Cortland Avenue. Increased queues on Cortland Avenue that may result from the project would somewhat increase delays for vehicles exiting Hilton Street, primarily for those vehicles destined to westbound Cortland Avenue because drivers would be attempting to make left turns through both directions of traffic. In addition, there is the potential for eastbound queues to block the Hilton Street intersection with Cortland Avenue, which would somewhat increase delays for vehicles exiting Hilton Street. Under existing conditions, queues on eastbound Cortland Avenue often extend past Hilton Street. During field observations conducted in October 2003, vehicles exiting Hilton Street and turning left onto westbound Cortland Avenue did not have substantial difficulty in exiting Hilton Street when eastbound queues extended past Hilton Street, because sufficient gaps were available in eastbound Cortland Avenue traffic. Although with the project the traffic volumes would increase and queues would lengthen on eastbound Cortland Avenue, similar gaps would be available for vehicles exiting Hilton Street. As such, the increase in traffic volumes on Cortland Avenue is not anticipated to substantially affect Hilton Street traffic. Since Hilton Street only serves the Floorcraft Garden Center back-of-house operations, minor traffic volumes, and occasional Muni buses (most of which are turning left onto Cortland Avenue westbound), any circulation issues due to the project would be relatively minor.

Comment #56

"Intersection Capacity Impacts. The signalized intersections capacity results at Industrial, Cortland, Oakdale, and Silver are all extremely close to exceeding the City standards. Even a very small increase in traffic would trigger the LOS E intersection standards used in San Francisco. Considering the many problems with the trip generation and distribution assumptions, it is clear that a more thorough analysis is needed, presenting more details and including additional mitigations that

will assure that LOS D (less than 40 seconds of delay per vehicle) will be maintained. This is needed before the traffic study can be considered 'sufficient evidence' to conclude that the proposed mitigations would 'clearly mitigate the effects' at the study intersections." (*Charles M. Abrams, President, Abrams Associates*)

Response #56

See Response to Comment #41 regarding the trip generation assumptions, and Response to Comment #44 regarding the trip distribution assumptions.

Most of the signalized intersections along Bayshore Boulevard have actuated signal control, including the study intersections of Bayshore/Oakdale, Bayshore/Cortland and Bayshore/Industrial. Actuated signal control means that the amount of green time for each approach is not fixed, but varies by signal cycle based on each approach's traffic volumes. As a result, the intersections can accommodate substantial increases in traffic volumes without worsening the overall intersection level of service.

In San Francisco, a signalized intersection is considered to operate with unacceptable conditions at LOS E or F (an average delay of more than 40 seconds per vehicle). An intersection that operates at LOS D would not be considered to operate with unacceptable conditions, even if the average delay approached 40 seconds per vehicle. Therefore, at these study intersections the project was determined to not have any traffic-related impacts and would not be required to implement additional mitigation measures. However, it should be noted that an improvement measure was recommended at the intersection of Bayshore/Silver to improve future operating conditions. Although the project would not make a significant contribution to the future operating conditions and the project sponsor would not be required to contribute to the implementation of the improvement measure, the project sponsor has volunteered to pay for it. See Response to Comment #143 regarding project sponsor funding of mitigation and improvement measures.

Comment #57

"There was no mention of the fact that trucks will be diverted to Bayshore during the construction of the rail line on Third Avenue. This is sure to exacerbate the traffic situation." (*Nic Griffin, Resident*)

Response #57

Construction activities on Third Street have been ongoing for the new Third Street light rail line. Light rail service is planned to begin in 2005, likely before the project is scheduled to open. During construction of the light rail project, two traffic lanes in both the northbound and southbound direction are continually provided on Third Street. As a result, it is not anticipated that a substantial volume of truck traffic will divert to Bayshore Boulevard as a result of construction. If any trucks were diverted, however, their effects would only be temporary and would not result in any substantial changes to the documented intersection operating conditions.

Comment #58

"Summary/Transportation, Page 4: DEIR indicates the proposed project would generate 848 vehicle trips during the weekday PM peak and 1,268 vehicle trips during the Saturday midday peak. Then, on page 5, it indicates that the additional vehicle trips would not change the operating conditions at the intersections studied. It states that all analyzed freeway on-ramps would continue to operate at the same levels of service as under existing conditions. Further, the second paragraph of page 5 states the increase in vehicles destined to and from the proposed project would result in a moderate increase in delay at individual movements at several study interjections. Vehicles making these movements may experience somewhat higher delays. These statements seem to contradict each other and require further explanation." (*Shelley Bradford Bell, Planning Commission President*)

Response #58

The vehicle-trips generated by the project were assigned to the local and regional roadway network, based on the origin/destination of each trip. As a result, these vehicles would be distributed throughout the area, and not travel through only one of the study intersections or one of the study on-ramps. In addition, there would be project driveways on Bayshore Boulevard (inbound/outbound and outbound-only), Loomis Street (inbound/outbound) and Waterloo Street (inbound/outbound), which would result in the dispersion of inbound and outbound traffic flows to various streets.

The methodology used to determine operating conditions at signalized intersections is based on the average delay per vehicle for all allowable traffic movements at the intersection. The levels of service (LOS A through F) are associated with a range of delays per vehicle. For example, an intersection with an average delay of 25 to 40 seconds per vehicle would operate at LOS D.

However, although the average delay at an intersection may indicate acceptable operating conditions, it is possible that individual movements within an intersection may have somewhat higher delays than average (for instance, the intersection of Bayshore/Industrial under Existing plus Project conditions would operate at LOS D during the weekday PM peak hour, but the eastbound left-turn movement would operate at LOS E). As such, vehicles making the eastbound left-turn movement may experience higher delays than the rest of the vehicles at the intersection. However, the increase in delays at these individual movements would not result in the intersections operating at unacceptable service levels or significant traffic impacts; they were noted in the DEIR on page 62 as supplemental information on intersection operations.

Comment #59

"These traffic and congestion impacts are not acceptable to the neighborhood or in keeping with the City policy of maintaining and strengthening neighborhoods and pedestrian-oriented, walkable, livable spaces." (*Amy D. Kyle, Ph.D., M.P.H., Resident*)

Response #59

As presented in the DEIR on pages 61 through 75, the project was determined to not result in any significant traffic impacts under the Existing plus Project scenario, in terms of freeway mainline and on-ramps, intersections, transit, pedestrians, bicyclists and parking conditions. It is anticipated that most vehicles destined to and from the project (about 72 percent of total traffic generated by the project) would use Bayshore Boulevard, which is classified as a Major Arterial in the *San Francisco General Plan*.

Comment #60

"The DEIR does not adequately address the traffic impacts created by the building design. It also does not adequately address and discuss the improvement conditions necessary to address the impacts on traffic flow. The only improvement conditions that seem to be addressed are the Cortland Street pedestrian walkways and signals. Additional consideration should be given to other intersections as a result of the design." (*Shelley Bradford Bell, Planning Commission President*)

Response #60

The traffic impact analysis conducted for the DEIR incorporated the site access plan designed and proposed by the project sponsor. As part of the project design effort, a number of improvements at adjacent intersections were included into the project. For instance, as described in the DEIR on pages 62 through 65 and presented in Figure 12 on page 63 of the

DEIR, several alterations would be implemented at the intersection of Bayshore/Cortland to maintain and enhance vehicular circulation. To accommodate vehicles destined to the project site from southbound Bayshore Boulevard, a southbound left-turn pocket would be created (within the current center two-way left-turn lane) and a protected left-turn phase would be established within the signal timing plan. Since the elimination of a portion of the center left-turn lane would affect vehicular access from northbound Bayshore Boulevard to the commercial establishment at 470 Bayshore Boulevard, a northbound U-turn pocket would be created. In addition, to account for changes to the signal timing, the northbound left-turn pocket would be extended by at least 70 feet (to a total distance of at least 210 feet). Other potential changes to the Cortland Avenue approach to Bayshore Boulevard have been proposed, including restriping the street to provide two eastbound lanes. These improvements would facilitate access to and from the project site and minimize the effects to traffic flow.

The project would not result in substantial changes to the weekday PM peak hour or Saturday midday peak hour operating conditions at the other study intersections. As a result, additional mitigation and improvement measures would not be required. In addition, the project would not result in impacts to traffic flow on the adjacent streets (if the project-related measures were implemented).

As indicated in the DEIR on page 79, other measures have been developed to improve the future 2015 Cumulative traffic conditions at the study intersections of Mission/Cortland and Bayshore/Silver. At the intersection of Mission/Cortland, DPT has indicated that it would be possible to modify the existing signal at the intersection to accommodate the new phase. DPT has also requested that the project sponsor pay for the full cost of this signal upgrade, and the project sponsor has agreed to do so²³.

On pages 12 and 106, the end of the first paragraph is revised to indicate that the project sponsor would pay for mitigation: "With this mitigation ~~improvement~~ **measure**, the intersection would operate at LOS C during the weekday PM peak hour

²³ Letter from Bond Yee, Director of the Department of Parking and Traffic to Tim Erney, Wilbur Smith Associates, September 7, 2004, op cit.

and LOS D during the Saturday midday peak hour. **The project sponsor would pay for the costs of this measure.**

At the intersection of Bayshore/Silver, the proposed changes to the intersection signalization plan would need to be made by DPT, and the project would not be responsible for contributing to the funding for this improvement (the project was not considered to have a significant contribution to the future intersection operations). However, the project sponsor has volunteered to fund this improvement measure. Please see Response to Comment #63 for changes to the DEIR text.

Comment #61

"The DEIR does not adequately address traffic impacts to major Bayview Hunters Point streets. BVHP has the largest number of homeowners in the City. Those who choose to patronize Home Depot will drive to the store. Roads such as 3rd, Oakdale, Palou, Silver, and Paul will be heavily used to reach Bayshore and access the project, and should be more adequately addressed in the Traffic Study." (*Shelley Bradford Bell, Planning Commission President*)

Response #61

Based on the market share analysis conducted for Home Depot by an independent market research firm (see Response to Comment #44), it was estimated that about 8.2 percent of the potential customers of the project would reside in the Bayview Hunters Point neighborhood. The vehicle-trips associated with these patrons (approximately 70 vehicle trips during the weekday PM peak hour and 104 vehicle trips during the Saturday midday peak hour) were assigned to the various east/west streets (Paul Avenue, Silver Avenue, Industrial Street, Oakdale Avenue, and Cesar Chavez Street) to access the project at Bayshore Boulevard and Loomis Street. These vehicle trips from the Bayview Hunters Point neighborhood account for a portion of the 15 percent of total trips during the weekday PM and Saturday midday peak hours that would use the driveway to the project located on Loomis Street. Since Bayview Hunters Point residents could use several different routes to access these east/west streets, the analysis intersections were focused along Bayshore Boulevard and Loomis Street, through which all vehicles would have to travel. The effects of project-related traffic would be reduced the further the distance from the project site, since traffic would disperse over the various streets.

Comment #62

"This Saturday Peak Hour Coincides with the Alemany Farmer's Market activity, further exacerbating the already congested conditions in that vicinity. The DEIR does not address whether project traffic will have any negative impact on the Farmer's Market." (*Eve Bach, Arc Ecology Consultant; Barbara Kyle, Resident/No Depot Committee Chair; and Ron Morgan, Bernal Heights Neighborhood Center Community Organizing Coordinator*)

"The Alemany-Putnam-Crescent intersection by the farmers market does not have proper stop signs. Traffic on the weekend is very bad when the farmers market (or flea market) is open. A Home Depot would increase this traffic and create a large bottleneck that is not adequately addressed in the report." (*Amy C. Miller and Virginia Bowen, Residents*)

Response #62

The transportation analysis conducted for the Saturday midday peak hour accounted for the Alemany Farmer's Market. It should be noted that the actual analysis hour (12:00 p.m. to 1:00 p.m.) was specifically selected to overlap with the peak period of activity of the adjacent roadway network, the Farmer's Market, and typical Home Depot operations. In addition, the study intersection of Alemany/Putnam/U.S. 101 southbound off-ramp was selected due to its proximity to the Farmer's Market.

During the Saturday midday peak hour, the intersection of Alemany/Putnam/U.S. 101 southbound off-ramp was determined to operate acceptably with the project. Although the project would add traffic through this intersection, it would be primarily on Alemany Boulevard (which has capacity to accommodate additional vehicles). The project is not anticipated to add traffic to Putnam Street or Crescent Avenue, the primary streets that serve the Farmer's Market.

Comment #63

"I think that this Home Depot proposal is huge, and will have a big negative impact on Bernal Heights and the surrounding area, including the traffic on the entrances and exits off of the freeways on either side of the proposed project, and on Bayshore Boulevard and Cortland – which I think people who have spoken about people not using Cortland Avenue as an avenue – as a means of getting to Home Depot – is completely wrong. The Home Depot is proposing a giant project; they are expecting to have a lot of business. And they are out building a three-story parking structure at the end of Cortland Street, not expecting people to come through there? So I think that we're going to have a big problem impact. One thing I would like to address also, and hasn't been spoken to, is I don't believe the DEIR adequately addresses the impact that traffic will have on the side streets of Bernal Heights, which are very narrow. And at present one car at a time can pass through a lot of the side streets on either side of Cortland, and as of now, we have to do a choreographed dance, and

politely allow another person to pass, because two cars at a time can't go down those streets. And so I'm expecting that if traffic increases on Cortland, that the side streets will become even more congested – which they really cannot handle any more cars." (*Rosanne Liggett, Resident*)

"Spillover to Side Streets. Traffic backups at Cortland and Bayshore will cause eastbound traffic to use residential side streets. The DEIR states, 'To avoid the queues and the associated delays at the Bayshore/Cortland intersection, drivers may divert to other routes, such as Putnam Street.'¹ We are certain this will happen, since it already happens during the busy Saturday Farmers Market time. The proposed improvement here is to add an additional right-turn lane from Cortland to Bayshore. But there are already two lanes of traffic there, even if there isn't a clear white strip dividing them. This is a non-solution to this situation. The DEIR makes it sound like there is very often a Muni bus there, eliminating the second right-turn lane. We wish the service was indeed that frequent, but there is rarely a bus there, and if so, only briefly." (*Eve Bach, Arc Ecology Consultant; Barbara Kyle, Resident/No Depot Committee Chair; and Ron Morgan, Bernal Heights Neighborhood Center Community Organizing Coordinator*)

¹ DEIR, page 68.

Response #63

The side streets that intersect with Cortland Avenue are typically narrow with significant grade changes. In addition, these streets primarily serve the local Bernal Heights residential neighborhood and do not provide a direct connection to major north/south or east/west thoroughfares. As a result, increases in traffic on these side streets would likely only come from Bernal Heights residents who are traveling to and from the project. The transportation analysis does assume that a portion of the project's customers would use Cortland Avenue between Mission Street and Bayshore Boulevard (about 13 percent of the total customers).

At the intersection of Bayshore/Cortland, the eastbound approach is 40 feet wide, with one travel lane in each direction and on-street parking and bus stops on both sides of the street. At the approach, there is a 120-foot-long bus stop for the Muni 24-Divisadero bus line (with 8- to 10-minute headways on weekdays and 15- to 20-minute headways on weekends). When buses are not stopped at the bus stop, the eastbound traffic flow usually operates as two lanes (vehicles turn left from the regular travel lane and turn right from the bus stop). When buses are stopped, however, they reduce the capacity of the approach to one travel lane (in addition, buses occasionally block the remaining travel lane by not pulling entirely into the bus stop). This results in queuing and vehicles encroaching into the westbound approach to maneuver around the stopped bus.

To improve operations at the eastbound Cortland Avenue approach, an improvement measure was proposed (as discussed on pages 65 and 110 of the DEIR). With the measure, the centerline between eastbound and westbound directions would be restriped to provide additional width in the eastbound direction, to allow for two travel lanes at the intersections. However, DPT has determined that this improvement measure is not desirable due to potential impacts on southbound Bayshore Boulevard right-turning traffic. As a result, this improvement measure would not be implemented and the proposed project would not change the configuration of Cortland Avenue.²⁴

On pages 16 and 110 in the DEIR, the first transportation improvement measure is deleted (please see Response to Comment #141 for discussion), and the second sentence of the paragraph before the transportation improvement measure is revised to read: "Improvement measures diminish effects of the project that were found through environmental analysis to be less-than-significant impacts. ~~These~~ **The following** measure would be implemented by the Department of Parking and Traffic and the cost ~~of the first measure~~ would be borne by the project sponsor."

Comment #64

"Impacts of Traffic Are Under-represented and Unacceptable. According to the Transportation Study, the Home Depot project would generate up to 848 additional vehicle trips per hour during the weekday peak hours, and an additional 1,268 vehicle trips during the Saturday peak hour.

"Level of Service Degradations for Intersections Unacceptable. Similarly, many of the intersections studied will degrade to LOS D or E if this project is built. The City considers LOS E and F as 'unacceptable.' Because Bernal Heights' geography limits our east/west access routes in and out of the neighborhood basically to either Cortland Avenue or Crescent Avenue, we consider LOS D as unacceptable. We do not really have the choice of going another way when one of these key intersections is congested.

"The chart below [Refer to Appendix E of this document, Eve Bach, Barbara Kyle, and Ron Morgan Letter dated July 24, 2003, *Traffic Ratings at Intersections and Freeway Ramps*] shows the projected levels of our intersections and on-ramps for the three projected periods, according to the Transportation Study. To allow so many key intersections to degrade LOS D, E, or F is an unacceptable result of this project, since it would substantially change the quality of life and pedestrian nature of the neighborhood.

²⁴ Letter from Bond Yee, Director of the Department of Parking and Traffic to Tim Erney, Wilbur Smith Associates, September 7, 2004, op cit.

"The chart below [Refer to Appendix E of this document, Eve Bach, Barbara Kyle, and Ron Morgan Letter dated July 24, 2003, *Traffic Ratings at Intersections and Freeway Ramps*] also brings to light how some of the LOS data in the transportation masks the true nature of the traffic impacts. The charts on Level of Service in the Transportation Study show averages for each intersection, which is misleading for some key intersections. For instance, the 'Existing Plus Project' LOS for Cortland and Bayshore is portrayed as D, which would be considered acceptable to the City (although not to us). What the DEIR does not mention is that this LOS D is an average for the intersection, and that the eastbound direction of Cortland at Bayshore degrades to LOS E during both the weekend and evening peak hours.¹ Similarly, by providing an average LOS for the intersection of Bayshore and Industrial, the DEIR overlooks the projection that 'both the eastbound left-turn movement and the southbound through movement would operate at LOS E.'²

"Yet, this is a crucial traffic patterns for cars coming off the freeway to reach the project location." (Eve Bach, *Arc Ecology Consultant*; Barbara Kyle, *Resident/No Depot Committee Chair*; and Ron Morgan, *Bernal Heights Neighborhood Center Community Organizing Coordinator*)

¹ Transportation Study, page 4-7.

² Transportation Study, page 4-7.

"I disagree with the finding in the DEIR that 776 trips during a weekday or 1,100 added trips on a Saturday would not be significant. They are saying that would not be a significant impact, and I disagree with that. There's been a lot of talk about people are projecting there will be additional traffic on Cortland. But living in Bernal, the only way to get out of that neighborhood to the rest of the city is either on Mission or Bayshore. And I think what a new Home Depot would do is block up Bayshore, and that's what would make Cortland back up, because everyone trying to get to work from Bernal area would be backing up – which to me feels very – almost a dangerous situation, where people in a neighborhood cannot actually exit their neighborhood to get to work." (Gretchen Mokry, *Resident*)

Response #64

The operating conditions of intersections are described by level of service. LOS is a qualitative description of an intersection's performance, based on the average delay per vehicle. LOS ranges from LOS A, which indicates free-flow or excellent conditions with short delays, to LOS F, which indicates congested or overloaded conditions with extremely long delays. The San Francisco Planning Department's significance criteria state that signalized intersections throughout the City, whether in residential neighborhoods or otherwise, are considered to operate unacceptably if, based on average delay at the intersection, they were to operate at LOS E or F.

The study intersections were analyzed using the *Highway Capacity Manual* operations methodology as described on page 48 of the DEIR, which is the approved methodology for the analysis of intersections, per the *San Francisco Transportation Guidelines*. The

methodology determines the capacity for each lane group approaching the intersection, and the LOS is based on the delay for the various movements with the intersection. A combined weighted average delay and LOS are presented for each intersection. Although operations of individual movements may be highlighted in a discussion of transportation conditions, intersection operating conditions are based on the entire intersection, not just one approach.

Based on the traffic analysis (DEIR pages 61 through 62), all study intersections would be able to accommodate the new vehicle-trips that would be generated by the project, and the Existing plus Project levels of service would remain acceptable (LOS D or better) during the weekday PM peak hour and the Saturday midday peak hour. Therefore, the project would not result in any significant traffic impacts. However, as indicated in the DEIR, some movements within the study intersections may experience somewhat higher delays and worse operating conditions than reported for the intersection as a whole.

In addition, DEIR pages 75 through 81 presents the results of the 2015 Cumulative conditions, which accounts for traffic growth from other developments in the area, as well as the project. Under 2015 Cumulative conditions, all study intersections would continue to operate acceptably during both the weekday PM and Saturday midday peak hours, except the intersection of Mission/Cortland. At this intersection, the LOS F operating conditions can be mitigated by upgrading the traffic signal to create a new southbound left-turn phase. According to DPT, it would be possible to modify the existing signal at the intersection to accommodate the new phase. DPT has also requested that the project sponsor pay for the full cost of this signal upgrade, and the project sponsor has agreed to do so.²⁵ Please see Response to Comment #63 for changes to the DEIR text.

Under 2015 Cumulative conditions, all five of the study on-ramps would operate at LOS F during the weekday PM peak hour, and two of the on-ramps would operate at LOS F during the Saturday midday peak hour (under existing conditions, one on-ramp operates at LOS F during each time period). It was determined that the project would have a significant contribution to the poor operating conditions at all study freeway on-ramps that operate at LOS F. However, the operating conditions are primarily dictated by the freeway mainline

²⁵ Ibid.

traffic volumes, and not the on-ramp volumes. Therefore, additional freeway mainline capacity would be needed on U.S. 101 and I-280 to alleviate the poor operating conditions. As a result, the project's significant contribution to the on-ramp conditions would be considered a significant unavoidable impact and is stated as such in the DEIR.

Comment #65

"Traffic Report. I believe that the traffic report does not include all of the traffic impacts and is unacceptable. Crescent Avenue was not considered a main east-to-west corridor between Mission and Bayshore. Crescent Avenue is used by many cars and buses (Muni 23 and 67). I live on Crescent Street and see the traffic daily. People from the Sunset, Glen Park, Forest Hill, and other western neighborhoods are likely to cut across the city using O'Shaughnessy to Bosworth to Crescent to get to the proposed Home Depot.

"People will not use Putnam Street when Cortland is clogged. My experience indicates that people will avoid Cortland and use Crescent because it is fast and only has three stop signs between Mission and Alemany." (*Amy C. Miller and Virginia Bowen, Residents*)

Response #65

Since Crescent Avenue does not directly connect with Bayshore Boulevard, drivers would need to turn onto another street, such as Putnam Street or Alemany Boulevard, to access the project site. As a result, although some vehicles destined to and from the project site may use Crescent Avenue, it would not be considered a major access route.

In the DEIR on page 68, it is acknowledged that some drivers may divert to other routes, such as Putnam Street, to avoid the potential queues and delays that may develop on Cortland Avenue. Drivers could then connect with Crescent Avenue.

On page 68, to clarify that some drivers may divert onto Crescent Avenue to avoid Cortland Avenue, the first paragraph, lines six and seven are revised: "To avoid the queues and associated delays at the Bayshore/Cortland intersection, drivers may divert to other routes, such as Putnam Street to Crescent Avenue."

Comment #66

"I have lived in Bernal Heights for 15 years; been a resident of the city for 25. I am absolutely opposed to this project, and I have serious concerns about the draft EIR. I think it is extremely inaccurate in addressing the traffic concerns that will affect Bernal Heights, particularly the intersection of Mission and Cortland, which is where the 24 has to turn, and also the intersection

across Cortland where the 67 crosses on Folsom. So I think it is not only a matter of affecting other cars that are coming down Cortland Street, but also having a serious and negative impact on buses that have to use those routes." (*Amy Beinart, Resident*)

Response #66

The intersections of Cortland/Mission and Cortland/Folsom were among the 14 inter-sections analyzed in the DEIR. Overall, the project was found to not significantly impact traffic conditions at these two intersections during the weekday PM peak hour and the Saturday midday peak hour. Although there would be an increase in vehicular delays along Cortland Avenue, these delays would not be substantial enough to affect operations of the Muni bus lines.

To identify issues and conditions at the intersection of Mission/Cortland, additional field observations were conducted in 2003 and 2004 during the weekday PM and Saturday midday peak periods. At the intersection, moderate vehicular delays were observed in the southbound direction, primarily due to vehicles and buses waiting to turn left on Cortland Avenue, and the Muni bus stop within the travel lane. However, due to gaps in the northbound traffic flow, most vehicles were observed to be able to make the turn within one signal cycle. The proposed project would not result in any significant impacts at the intersection of Mission/Cortland under Existing plus Project conditions. However, under year 2015 Cumulative conditions, the proposed project would have a significant contribution to the poor operating conditions at this intersection. As indicated on DEIR page 106, a mitigation measure has been identified to improve operating conditions at the intersection of Mission/Cortland to acceptable conditions (LOS D or better). DPT has indicated that it would be possible to modify the existing signal at this intersection to accommodate a new phase. DPT has also requested that the project sponsor pay for the full cost of this signal upgrade,²⁶ and the project sponsor has agreed to do so. Please see Response to Comment #63 for changes to the DEIR text.

²⁶ Ibid.

Cortland Avenue

Traffic

Comment #67

"I think the traffic was less on Cortland tonight because everybody was here testifying from Cortland. I appreciate the input; I think there were a lot of good things that came out of it. I think a lot of things do have to be addressed before this report is finalized.

"I think Cortland is clearly a street that is going to need to be addressed. There may have to be other ways that [it] would be engineered. It is not my place to bring up suggestions at this time, but I think that part of the report will have to have some other treatments of the end of Cortland coming into the Home Depot." (*Michael Antonini, Planning Commissioner*)

"I am a small business owner with a location at the foot of Cortland Avenue, near the Home Depot site, and I am very concerned that the increased traffic will make deliveries to my site so difficult that my suppliers will not be able to send their trucks." (*Mike Boss, Resident*)

"I live in Bernal Heights and use Cortland all the time. Traffic on Cortland and Bayshore will be horrible with a Home Depot. There should be smaller stores along Bayshore, not Home Depot." (*David Chatfield, Resident*)

"Already traffic is a large problem on Cortland, which is the only road accessing Bayshore from Mission. This neighborhood will be adversely impacted by increased traffic noise and pollution." (*Mae Chesney, Resident*)

"I am concerned because Cortland has more traffic than ever at this point. We are a quiet residential neighborhood and cannot handle any more traffic, pollution, or noise. I believe the Home Depot store at the Bayshore location will erode the qualities that make Bernal a desirable neighborhood." (*Scott E. Cunningham, Resident*)

"Cortland, being the only substantial east/west street, may have its circulation affected. Cars will move to other side streets. Cortland already becomes very slow at peak times. The project will exacerbate this and create difficulty for cars trying to enter Cortland from side streets.

"Southbound trucks turning from Bayshore into Cortland will have to cross the center divider and cause a hazard. Parking spaces will be eliminated to accommodate them.

"The new signals at the intersection of Cortland and Bayshore will go through an extra cycle to let traffic turning into the garage. This will mean longer waits for residents entering Bayshore from Cortland." (*Nic Griffin, Resident*)

"I think the DEIR severely underestimates the impact traffic will have on Cortland Avenue. It notes that all the adjacent freeway exits are going to be crowded. One of the things is when people are crowded, people will go out of their way. Traffic flows just like water. You can expect people are going to be going through Bernal Heights on Cortland, and other ways as well." (*John Hayes, Resident*)

"The DEIR grossly underestimates the negative effects of additional traffic upon Cortland Avenue. The DEIR's projected negative effects upon traffic from the additional vehicle-trips are grossly underestimated. Cortland Avenue is already crowded during morning and evening rush hours near Bayshore Boulevard and near Mission Street, and during the day along the retail portion of the street. The additional traffic from the project will likely cause severe traffic backups along the entirety of Cortland Avenue, because the retail area of the street has many stop signs and tends to back up somewhat even now. Not only does backed up traffic adversely effect drivers by the time wasted, but the significantly increased air pollution from it also adversely affects both those of us who walk to the retail portion of Cortland and those who live nearby. The increased traffic would also make it more difficult and dangerous to cross Cortland Avenue, as discussed above." (*Jeff Hoffman, Resident*)

"I have lived in Bernal Heights for about 15 years; lived in the city for 30 years. I was just looking at the map here. I think it has been pointed out that the main entrance and exit is Cortland Avenue. So we're talking about Cortland Avenue, which is already congested all throughout the day, early in the morning through late in the evening, serving as a driveway into this gigantic Home Depot project. And I think that this draft does not adequately address the traffic impact. We're also going to be talking about – they talk about vehicles. They just say "vehicles." 150 vehicles per hour are going to be added at peak times. What they don't specify is what kind of vehicles. We're not talking about electric cars and Volkswagen bugs. We are talking about vans; we're talking about large pickup trucks; we're talking about delivery trucks, for that matter, going back and forth across Cortland. They are not going to all make it over in that hour, because there's going to be a huge congestion along there. It is going to take more than an hour to get across the hill if we start adding all this traffic. They are going to start going off on side streets; there is going to be idling; stopping; starting. And really I urge you, rather than just reading these things and listening to people, just drive over to the area where this project is proposed: drive down to Colma; look at the congestion that Home Depot causes, and just use common sense." (*Douglas Holloway, Resident*)

"The Home Depot site is at the end of Cortland, where it terminates at Bayshore. This means that the only access to this site for people coming from most of the City will be via Cortland Avenue. The DEIR recognizes the huge traffic impact that this site will have on Cortland by noting that traffic will become unmanageable at Cortland and Mission Streets, which is about a mile from the project site, at the other end of Cortland. This means that traffic will also be unmanageable all along Cortland Avenue from Bayshore to Mission. This is a hugely devastating impact for what has become a thriving neighborhood and is unacceptable. It is hard to imagine how a DEIR could be written without even acknowledging this concern." (*Amy D. Kyle, Ph.D., M.P.H., Resident*)

"Regarding Cortland, I know on Saturdays and Sundays, as I have driven by there on Bayshore, there are very few cars at this time going up or down on Cortland. And I don't know if we have information on when Goodman Lumber was there, because frankly, the Home Depot really replaces Goodman Lumber, and also where Whole Earth Access was. So we did have a lot of traffic in those days; I don't see any information in the EIR that addressed that issue. Will this in fact be any greater than it was five or six years ago? I don't know how to answer that question; I would ask staff to look into it." (*Bill Lee, Planning Commissioner*)

"The proposed Home Depot Megastore project will have a devastating effect on the traffic on Cortland Avenue. There is already too much use of Cortland Avenue as an east/west conduit. Home Depot traffic will only compound an enormous problem." (*Gary A. Marcus, Resident*)

"The traffic is already bad on Cortland Avenue, especially at the corner of Bayshore at rush hour. In the morning, there is already a line of cars bumper to bumper, and one has to wait for two or three lights to turn on Bayshore." (*Michael Marrelli, Resident*)

"I have been a resident in San Francisco for nine years now, and a lot of this is kind of repeat information, but I basically have three concerns with Home Depot. First, how it will affect my neighborhood, the traffic, and the air pollution. The whole reason I actually moved to San Francisco – and I used to live in the suburbs, but as the last guy was just saying, San Francisco is very unique, and what makes it unique is like the small coffee shops and little restaurants; all the small businesses. And it is just such a great city, as we all know. Bernal Heights is also just a fantastic neighborhood. On a Saturday if you go out there will be like tons of parents with strollers and dogs, and people know each other, and it is just this cute little neighborhood, and I just love it there. And thinking of the Home Depot going in, I can just visualize it – you know, a few years from now, where it will just be like traffic moving down Cortland, and I really think it is a hard thing to quantify, but it is going to change the charm of this neighborhood, and that's a big concern for me. As far as traffic goes, like I said, along Cortland – and I have a garage, and at times I'm trying to back out of my garage right now I'll have to sit there and wait sometimes like five minutes, because cars are just flying by constantly on Cortland. So already there is a lot of traffic, and I can vouch for that." (*Katherine Massey, Resident*)

"Our second concern is traffic impacts. Unfortunately, the tragic impact will not only affect Cortland at Bayshore, but the already congested Cortland at Mission Street. We live right around there, and Bernal Heights will become the 'vein' to get to the new Home Depot. It is too large, too much traffic, pollution, and unforeseen hazards that will negatively affect a beautiful and charming and up and coming neighborhood." (*Nina Mayer, Resident*)

"The impact of traffic flow on Cortland Avenue and Bayshore." (*Patricia F. McManus, Resident*)

"I have been a five-year resident there, and I am associated with Prudential of California Realty. I think the DEIR report doesn't go quite far enough. I think, as everyone has said, we don't have to wait until 2015 for the problems; you can see them already today. And I would like to address my remarks in three areas, first starting with the traffic issue. First of all, concerning Mission and Cortland, I think it is obvious what is going to happen here, in terms of the problem is already bad enough for those trying to travel outside our community. It is an absolute nightmare.

"...with respect to Cortland, I hate the backlog. As you will see, the street itself is backed up, but the parking problem is going to be substantially exacerbated, and that's something not tenable for us who live in Bernal." (*Gil Payne, Resident*)

"I don't want more traffic on Cortland. No Home Depot." (*Yolanda S. Salazar, Resident*)

"Increased traffic on freeway entrance (Bayshore) as well as on Cortland and at Cortland/Mission intersection, as documented in the EIR." (*Ken Shelf, Resident*)

"When I first moved here, Myrtle, the main corridor to Cortland was a relative ghost town, and at night you take your life in your hands walking around there; there is a lot of drug activity. Bernal has emerged to be one of the jewel neighborhoods in San Francisco – but with a price. And right now in this report it talks about the year 2015 that the ramps will be all jammed up, and that there will be problems with the intersection of Cortland and Bayshore. Well, I would suggest that you take a nice

day – day off, or sometime in the weekend, and travel in our lovely neighborhood, and find out for yourself what it is like to travel down Cortland to Bayshore, or then to make a left turn and try to get on 101. It is so frustrating that half the time right now when I try to get on 101, I end up taking Potrero, because I just can't deal with the traffic and the queue backing up to 101. That's right now. I work at KALW, which is in the Burton High School, which is the Silver Avenue exit, so a lot of times I come down Cortland and I make the right turn to get on 101, so I know what I'm talking about when right this moment there's heavy congestion on Cortland. I mention that with Home Depot coming in and whatever else may follow, that people in Noe Valley, Twin Peaks and the Castro – I mean it is a slam dunk that they are going to come through Mission and to Cortland. I mean that's the short-cut; that's the way to do it. It is too tricky the other ways. So it will make a very, I think, profound negative impact traffic-wise, and also in terms of air pollution. In addition, I would also – this is maybe more of an aside, but when we talk about putting a retail establishment in that box, I'm sure that San Francisco can do a better job to find a mid-sized retail solution that would deal with the youth of Bayview Hunters Point, and give them meaningful employment." (*Dory Steinberg, Resident*)

"I am concerned about the increased traffic between Cortland/Mission and Bayshore Boulevard. Cortland Street is a small corridor and most likely couldn't hold a large increase in the number of cars using this corridor to travel to Home Depot." (*Gina Surber, Resident*)

"The traffic right now on Cortland does queue up just to get into Bayshore. Ten cars now; with Home Depot, 25 cars, when cars and trucks deliver to the store, and it is chaos on Cortland. It is not just about Cortland; it is not about Bayshore; it is about our transit corridors to move in and out of the community. We support the local businesses down there, and we feel that this will displace them. There will be 1,200 new cars down there per hour, which is going to be impossible to deal with. Public transportation will be slow. We pride ourselves on being a transit-first community in the city. The data that has been used is, as we mentioned – needs to be reviewed; needs to be disputed; it is not accurate. The on ramps are backed up coming down to traffic off the 101. It is going to have a tremendous negative impact. We do want to work on developing an alternative development plan for the sites, and we ask you to reject the draft EIR today, or when you do take your vote." (*Mauricio Vela, Executive Director, Bernal Heights Neighborhood Center*)

"Since I have lived in Bernal Heights for so long, I have seen this small community change dramatically (as, of course, have other neighborhoods in the city). Clearly, traffic is one of the major changes. At one time, you could throw a bowling ball down Cortland and not hit anything; now, however, there is a great deal of traffic. Building a huge business such as Home Depot at the end of Cortland would increase traffic tremendously and eliminate one of the reasons people move to Bernal Heights - to live in a quiet uncongested neighborhood. It's clear to anyone that Cortland, from Mission to Bayshore, would be a major artery to get to Home Depot." (*Linda Weiner, Resident, Director of Air Quality Advocacy for the American Lung Association*)

"I am concerned about the traffic impact all along Cortland Street, as well as Bayshore Boulevard, where there is already significant traffic, especially at rush hour." (*Marci Yellin, Resident*)

"The cut-through traffic on Cortland is already dangerous. This big box store is too big for this City, and the traffic will get worse and more dangerous." (*Randy Zarcher, Resident*)

Response # 67

Although the proposed project driveway would be located at the intersection of Bayshore/Cortland, its location is not intended to direct vehicles to use Cortland Avenue as the primary access route to the project. As indicated in the DEIR on page 59, the primary access route to the site would be Bayshore Boulevard, with about 72 percent of all vehicles using northbound or southbound Bayshore Boulevard to access the project driveways. Since Cortland Avenue is a narrow street, with STOP signs, grade changes and relatively slow travel speeds, it was assumed that drivers from other areas would tend to use other east/west roadways, such as Cesar Chavez Street and Alemany Boulevard, when possible. It was estimated that about 37 percent of the project patrons would come from the Twin Peaks, Mission, West Portal, Balboa Park, and Lake Merced neighborhoods, and that 34 of the trips from these neighborhoods would use Cortland Avenue to access the project site (this represents about 12.5 percent of the total trips generated by the project). The routes that were assigned to the street network included the use of Randall Street, San Jose Avenue and Mission Street to Cortland Avenue. While it is anticipated that some patrons would use Cortland Avenue to access the project, it is not anticipated that the adjacent residential side streets would be used, except by patrons living within the Bernal Heights neighborhood.

The project was estimated to generate about 848 new vehicle-trips during the weekday PM peak hour and 1,268 new vehicle-trips during the Saturday midday peak hour, which would be a mix of all vehicle types (information on the types of vehicles that would travel to and from the project is not available; however, the vehicle mix would include private autos and commercial vehicles, including contractor and delivery trucks). All vehicle types were included in the impact analysis at the study intersections. Pages 61 through 68 of the DEIR present the results of the analysis of traffic conditions at the study intersections. The anticipated increase in traffic associated with the project on Cortland Avenue (about 106 vehicles during the weekday PM peak hour and 159 vehicles during the Saturday midday peak hour) would not substantially worsen operating conditions along Cortland Avenue. At the study intersections of Cortland/Andover and Cortland/Folsom (located along the main section of the Cortland Avenue commercial district), the project would result in a minor increase in the average delay per vehicle at the Cortland Avenue approaches. Under Existing plus Project conditions, the project would not result in any significant impacts at the study intersections. Under 2015 Cumulative conditions, the intersection of Mission/Cortland

would operate at unacceptable conditions. Mitigation measures have been proposed to improve inter-section operations to acceptable conditions in the future. The increase in traffic volumes on Cortland Avenue would result in an increase in the average delay per vehicle, and would also result in the increased potential for conflicts with pedestrians and vehicles double-parked along the street. However, due to the relatively small impact on intersection operations at the Cortland Avenue study intersection, the increase in vehicles on Cortland Avenue would not be anticipated to substantially impact pedestrians crossing Cortland Avenue.

The new configuration of the intersection of Bayshore/Cortland would require modification to the existing traffic signal. The signal cycle length would increase from 60 seconds to 110 seconds, due to the provision of a new exclusive southbound left-turn phase and a new westbound phase to accommodate vehicles destined to and from the project. Under Existing plus Project conditions, the eastbound approach of Cortland Avenue to Bayshore Boulevard would have an average delay of about 34 seconds per vehicle, as compared to an average delay of 19 seconds per vehicle under Existing conditions. Therefore, although there will be an increase in delay at the intersection, the intersection would continue to operate with an acceptable level of service.

Trucks accessing westbound Cortland Avenue from southbound Bayshore Boulevard would make the movement as they currently do under existing conditions. No parking spaces on Cortland Avenue are proposed to be eliminated as part of the proposed project. An improvement measure was identified on page 110 of the DEIR that would eliminate two or three on-street parking spaces on the north side of Cortland Avenue, immediately west of Bayshore Boulevard, and move the center line to the north. However, DPT has determined that this improvement measure is not desirable due to potential impacts on southbound Bayshore Boulevard right-turning traffic. As a result, this improvement measure would not be implemented and the proposed project would not change the configuration of Cortland Avenue, as discussed in Response to Comment #63.

Although the project would result in an increase in the number of vehicles on Bayshore Boulevard and would somewhat increase the average delay per vehicle at the study intersections, the project would not restrict access to any business establishments.

Pages 68 through 70 of the DEIR present the discussion of impacts of the project on transit operations. The additional vehicle-trips generated by the proposed project are not anticipated to substantially affect transit operations along Cortland Avenue, Crescent Avenue, or Bayshore Boulevard.

Pages 47 and 61 of the DEIR present the impacts of the proposed project on freeway on-ramp operations. As indicated on page 61 of the DEIR, the project would not change the operating conditions at the study freeway on-ramps over existing conditions, and the project would not have a significant impact to freeway on-ramp conditions. See Responses to Comments #80 through #84 for discussion of project impacts on freeway ramp operations.

The following is in response to Commissioner Lee's comment regarding traffic levels during operation of Goodman's Lumber and Whole Earth Access stores. Since the project at the current site was proposed after the closure of the Goodman's Lumber and Whole Earth Access stores that existed on the site, it was not possible to determine the level of traffic volumes associated with those uses. Therefore, comparisons between the project-generated trips and trips generated by previous uses cannot be made. However, it is likely that traffic volumes and vehicular delays when both Goodman's Lumber and Whole Earth Access were open would have been higher than those documented for the existing conditions.

Parking

Comment #68

"I live on Cortland, right in the commercial heart of it at 430. It's like Wall Street. I'm also self-employed, working at my home, and use my car frequently for my job – which is required. And as people have said, and as I know very well, Cortland already is quite a mess. One person said it was worse in the morning commute; I would agree with that with one exception, which is the evening commute, from about 3:00 to 5:00. We have a combination of double-parked cars; buses where there is no provision to pull over. In the morning there's delivery trucks, some of which are semis that come up there, and for example, the trucks that deliver to Bernal B's, which is right in front of the library, right next to the community center – that semi is sometimes the length of the entire block. The streets are extremely congested as they are, and extremely narrow. There's very few options to get from western neighborhoods except through Cortland. People use it now; people will continue to use it. So when I see in the DEIR these D's and F's at some of these intersections like Mission and Cortland; Andover and Cortland, it is very frightening to me. And it will impact on my work and my ability to do my assignments – to do my assignments in a speedy manner and a necessary manner to

meet deadlines. So I urge you to reject this EIR, look for a more suitable, more development for that area." (*Rick Gerharter, Resident*)

"There will be a major impact on traffic. Since moving to Bernal Heights in 1989, there has been a wealth of change; not least is the volume of traffic. Cortland Avenue has become a vibrant center for the neighborhood. Parking has become difficult with the consequence that many more trucks are double parking in order to deliver to more and more stores on Cortland Avenue. At present, the situation is manageable; however, a Home Depot at the base of Cortland Avenue at Bayshore will make Cortland a major thoroughway. Rather than being a destination, Cortland will become merely a means to an end." (*Jeremy and Janice Lane, Resident*)

"The plan calls for a three-level parking lot at the end of Cortland Street. What will be the result of this besides being a blatant eyesore on the landscape? Traffic will back up all along Cortland Street as people from across town try to access the lot. Cortland Street is now a mixed residential and commercial street that cannot accommodate this new large influx of traffic. The side streets parallel to Cortland are so narrow that only one car at a time can go down the street. If two cars are in the same block, a choreography must be implemented by the drivers to pass each other. Additional traffic will exacerbate this problem and will undoubtedly cause tempers to flare and additional car and pedestrian accidents. Most streets of Bernal Hill do not even have city street cleaning because the streets are so narrow. Additional traffic will also mean there will be parking problems in the commercial area of Cortland Street and additional trash, which is an ongoing problem of the neighborhood." (*Rosanne Liggett, Resident*)

"Yet, the threat of Home Depot two blocks from my house is extremely distressing. There will be so much traffic on Cortland and the side streets that the character of the neighborhood will definitely be compromised. Those of us who utilize the stores and other outlets on Cortland will have great difficulty finding parking and the press of cars will greatly affect the atmosphere." (*Deborah Ruskay, Resident*)

"No consideration of impact on Cortland parking (already bad) and ecology/environment." (*Chris Witteman, Resident*)

Response #68

The project is not anticipated to have a substantial effect on parking supply and occupancy, and double-parking along Cortland Avenue. While the increased traffic volumes may make parking more difficult on Cortland Avenue, they would not substantially change the characteristics of the street or increase volumes of traffic to a level of significance at the study intersections on Cortland Avenue. In general, project-related vehicles on Cortland Avenue would likely be local residents or from other nearby area. It is not anticipated that the project would increase the parking demand on Cortland Avenue or increase the amount of trash on the street. Only local residents of Bernal Heights are anticipated to use the north/south side streets to travel to and from the project site.

Please see Response to Comment #67 for information on distribution of trips to and from the proposed project and Response to Comment #70 for information on vehicular/pedestrian conflicts. As indicated on page A-18, Appendix A of the DEIR, the proposed project would not result in any significant adverse impacts on biology. Air quality was analyzed in the DEIR on pages 81 to 92; please also see Responses to Comments #115 to #126 for further discussion of air quality impacts.

Transit

Comment #69

"Cortland Avenue cannot handle the volume of traffic that will be generated by this store with its focus on auto-driving customers. Many customers will try to approach via Mission to Cortland. Public transportation on Mission and Cortland will be hindered." (*Amy Beinart, Resident*)

"I live on Cortland Avenue and am very concerned about the increased traffic that the proposed Home Depot will generate. Already, it is a busy thoroughfare, one of the few that connects Noe Valley, Glen Park, and other neighborhoods to the Bayshore, freeways, etc. Already there is frequent congestion from the 24 bus route (which has few pull-over stops on Cortland), business deliveries, and double-parked cars at the ATM and video stores. The intersection of Cortland and Mission is of particular concern. My work requires me to drive, and frequently I come and go from my house several times a day. More traffic would be a big problem for me and my work responsibilities. A Home Depot is NOT a good use for that property on Bayshore." (*Rick Gerharter, Resident*)

"No consideration of impact on perpendicular (to Cortland) transit routes - Putnam, Nevada, Prospect, etc." (*Chris Witteman, Resident*)

Response #69

The volume of traffic added by the project would not substantially affect the operations of the Muni 24-Divisadero bus line on Cortland Avenue, and Mission Street, or the 67-Bernal Heights on Folsom Street, Cortland Avenue, and Nevada Street. Since the primary use of Cortland Avenue for project-related vehicles would be between Mission Street and Bayshore Boulevard, it is anticipated that only local residents would use the narrow residential side streets. Therefore, no or minimal increases in traffic volumes were estimated on the side streets as a result of the project. As a result, the transit routes that operate in Bernal Heights perpendicular to Cortland Avenue (e.g., as noted by the commenter, on Putnam Street, Nevada Street, and Prospect Avenue) would not be significantly impacted by the proposed project traffic.

Pedestrians

Comment #70

"The increased traffic on Cortland will cause intolerable congestion that will create unsafe conditions. I am concerned for the safety of my kids and others in the neighborhood." (*Mike Boss, Resident*)

"I have lived for 20 years at the corner of Cortland and Prospect. I'm very concerned about the future when I hear another 1,200 cars going through every hour. Because why would you use Cortland to get over there when everyone says 'Well, it is too crowded'? Well, the reason is because Cesar Chavez has a lot of stop lights that one would have to stop at, whereas Cortland has stop signs. So people blow through the stop signs. My experience living at Cortland and Prospect is that when I want to go up and shop at The Good Life Grocery, for example, trying to cross the street you can take your life in your hands at some times, because the people that drive through a neighborhood – my attitude when I'm in a neighborhood is that I'm in my neighborhood walking around, but when someone is driving through my neighborhood trying to get somewhere at rush hour, their attitude is I'm in the way, and I shouldn't be crossing the street. And if I do, 'Screw you.' I have had that happen. I have been hit by a car before in my life; it is a very frightening experience. And I was almost hit by a car outside The Good Life Grocery, from people who just say, 'Well, the residents are in the way, and they should wait for the cars to go.' And they don't know who has the right of way in a crosswalk. At Cortland-Prospect, when cars come over the hill and they see the deadlocked cars backed up for a block going down to Mission Street, going westward on Cortland, they take a right on Prospect, oftentimes in an SUV taking it like a Porsche. There is like the gunning acceleration, and 'I've got my radial tires on, and my anti-sway bars, and I can go 35 miles an hour' – through a street that would be better built for like 15 miles an hour. And that's just the way they are. I clean up the front of our house that we live in, and get the soot off of it, and within three days or so there is another coating of black soot on the white paint." (*John Daniel, Resident*)

"[The DEIR does not] consider the significant negative impacts of additional traffic upon pedestrians in the retail area of Cortland Avenue, where there are far more pedestrians than at Cortland and Bayshore, the area addressed by the DEIR regarding pedestrian impacts (DEIR at [page] 70).

"The increased traffic from the project will cause increased delays and danger to pedestrians in the retail area of Cortland Avenue and on side streets near Cortland.

"Pedestrians already face delays in crossing the retail area of Cortland Avenue due to the traffic there. This project will cause even more delays for those pedestrians and add to the danger of crossing Cortland. The DEIR totally fails to address this issue, which is a change in the existing physical conditions along Cortland Avenue, making it a significant effect of the project that must be addressed by the DEIR.

Pedestrians on side streets near Cortland Avenue will also be negatively affected by the increased traffic from vehicles attempting to escape the increased traffic on Cortland. These pedestrians will face a substantially increased danger from the additional traffic, because the drivers using side streets to avoid Cortland will be in even more of a hurry than those on Cortland and will thus be driving faster and more aggressively. Again, this will be a very large change, as there is currently very little traffic on these side streets and, again, the DEIR totally fails to address this substantial and significant negative effect of the project." (*Jeff Hoffman, Resident, written comments*)

"The delays and dangers to pedestrians that may be caused by all the extra traffic along Cortland Avenue, and the extra traffic on Cortland Avenue that would make it hard for residents to get around. And also, I add that the extra traffic is going to be on the side streets around, because Cortland is going to be so backed up by this project – if it happens." (*Jeff Hoffman, Resident, oral testimony*)

"It is already very congested on Cortland Street and, in fact, difficult to cross safely even during the slow times of the day. This project does nothing to address long-term, appropriate development of this community. As a community, we are interested in locally grown mixed-use projects that serve the specific needs of this community and support our very local economy." (*Lynnly Labovitz, Resident*)

"Traffic flow through Bernal Heights along Cortland significantly would increase. This traffic flow would not contribute to the merchants on Cortland and would surely contribute to additional pedestrian/car accidents at intersections all over Bernal Heights (such as Andover and Cortland). For reference, just try to get to the Home Depot in Colma on a Saturday or Sunday." (*Michael D., Linda, Catriana, Hanh, and Michael L. Larson, Residents*)

"I have worked for the City and County of San Francisco for 18 years, first for the Recreation and Park Department, and presently for the Department of Public Works. I have also lived in Bernal Heights for the last eight years. Before that I lived in Noe Valley as a homeowner, and I know whenever I wanted to do a home improvement project, I very cleverly used the short-cut down Cortland instead of Army Street, as it was then called; now Cesar Chavez, to get to Goodman's Lumber. And I feel that it will be a lava flow from the neighborhoods of Diamond Heights, Glen Park and Twin Peaks, down Cortland, to visit the new Home Depot. I think, besides the traffic coming down Cortland, we have a huge pedestrian population enjoying our lovely, unique neighborhood. There are many children, seniors, and handicapped people walking around. Several times, on my way home from work up Cortland, I have witnessed – two accidents and several near-miss accidents in front of The Good Life. Cortland Avenue is an east/west-facing street and at sunset time, which is earlier in the year during winter, the sun is blinding, and people are impatient and sort of run stop signs, have caused two accidents that I have witnessed, and many near-misses. Also, on my way to work – I work in the DPW yard off of Bayshore and Kansas – on the way to work I roughly travel Cortland at about 7:00 a.m. in the morning. There are two businesses at the far end of Cortland, near Bayshore: Ruiz Paving and Rock and Rose Landscaping. Ruiz has many, many large trucks, which they must back out of their facility." (*Chris Ellen Montgomery, Resident*)

"The increase in traffic on Cortland and other residential streets is unacceptable. There are many children here and they sometimes play on the (currently) quiet residential streets. More traffic will make this dangerous." (*Jo Ann Ogden, Resident*)

Response #70

The *South Bernal Heights Traffic Calming Study*,²⁷ completed in 2002, was conducted to determine how best to improve safety for pedestrians and bicyclists, and reduce speed and cut-through traffic on local streets. A number of improvement measures were identified for Cortland Avenue to reduce speeding and through traffic while respecting the important

²⁷ City and County of San Francisco, Department of Parking and Traffic, *South Bernal Heights Traffic Calming Study*, Final Report, November 2002, op cit.

functionality of the street as a transit route and pedestrian environment. These measures included the use of improved pavement markings and installation of traffic islands and bus bulbs to enhance intersection visibility, reduce pedestrian crossing distances, increase driver attention at crossings, increase sidewalk area and improve transit operations. DPT will implement these measures in the near future, as funding becomes available. While the proposed Home Depot store would add to the existing traffic volumes on Cortland Avenue, which would increase the potential for vehicular/pedestrian conflicts, the additional volumes would not be substantial enough to significantly affect the operating conditions at the signalized and unsignalized intersections, and would not result in a significant increase in safety risks to pedestrians and bicyclists. Implementation of the project would not conflict with the goals and effectiveness of the planned traffic calming measures on Cortland Avenue and other Bernal Heights streets.

The major intersections within the retail area of Cortland Avenue have crosswalks and are all STOP-controlled, and pedestrians have the right-of-way to cross the street. The project is not anticipated to increase the volume of traffic or travel speeds on the side streets within the Bernal Heights neighborhood. Although the average delay per vehicle at intersections along Cortland Avenue would somewhat increase with the addition of project-generated vehicle-trips, this increase would not be substantial and the study intersections would continue to operate acceptably. As such, it is not anticipated that traffic volumes on Cortland Avenue (either existing vehicles or new vehicles generated by the project) would divert to the side streets to travel between Bayshore Boulevard and Mission Street or result in faster and more aggressive driving on these streets as suggested by the commenter. Since most side streets within Bernal Heights are narrow, discontinuous, and have substantial grade changes, only local residents of Bernal Heights would likely use the north/south side streets to travel to and from the project site, and project-generated vehicles are projected to use Cortland Avenue as the most direct route between Mission Street and Bayshore Boulevard.

With regard to questions of appropriate community development, as noted in Response to Comment #26, the DEIR on pages 40 and 41 lists some of the relevant objectives and plans of the *General Plan*, and the Planning Commission would determine the consistency of the proposed project with the *General Plan*. As indicated on page 41 of the DEIR, the project site is zoned M-1 (Light Industrial), and the proposed project would conform to that zoning.

See Response to Comment #54 for additional information on the *South Bernal Heights Traffic Calming Study* and accident data along Cortland Avenue. See DEIR pages 81 to 92 and Responses to Comments #115 through #126 regarding the Air Quality analysis.

Other Traffic Issues

Comment #71

"Mission and Cortland Intersection Degrades to LOS F. The Transportation Study shows the intersection of Mission and Cortland degrading to the unacceptable LOS F. This will have serious impacts for Bernal residents, as this is a primary gateway to and from Bernal Heights. It will also impact many Muni lines, including the 14-Mission, 24-Divisadero, 49-Van Ness, and 67-Bernal Heights. The proposed mitigation to this is to install a left-turn signal for southbound Mission Street. This is completely inadequate to resolve the problems that this traffic will create. The DEIR assumes that the traffic will be primarily southbound, turning left onto Cortland (to cut through Bernal Heights to reach the Home Depot). Yet, traffic counts from the recent BART Feasibility Study for a possible 30th and Mission Station do not confirm this assertion that most traffic is southbound. In BART's counts, the southbound total for a 24-hour period was 8,020 vehicles, and the count for northbound traffic was 10,668 vehicles (*Feasibility Study for an Infill BART Station*, May 2003, Appendix B). So, a left-turn lane for the southbound traffic would cause more delays and queuing for northbound traffic. The proposed mitigation is completely inadequate. This situation warrants much more careful study and analysis." (*Eve Bach, Arc Ecology Consultant; Barbara Kyle, Resident/No Depot Committee Chair; and Ron Morgan, Bernal Heights Neighborhood Center Community Organizing Coordinator*)

Response #71

Field observations of traffic operations were performed at the intersection of Mission/Cortland during both the weekday PM and Saturday midday analysis time periods. Under existing conditions, it was observed that the longest delays to traffic (and correspondingly the highest congestion) was in the southbound direction. These delays were primarily due to vehicles and buses waiting to turn left on Cortland Avenue. In addition, the stop for the southbound Muni 14-Mission, 49-Van Ness and 67-Bernal Heights bus lines is located to the north of the intersection, within the curb travel lane (the 24-Divisadero turns left onto Cortland Avenue). As such, when Muni buses are stopped, congestion in the southbound direction is exacerbated. Due to gaps in the northbound traffic flow, most vehicles are able to make the left-turn onto Cortland Avenue within one signal cycle (either during the green or the yellow phases).

As indicated in the DEIR on pages 61 and 62 under Existing plus Project conditions, the intersection of Mission/Cortland would operate at acceptable levels of service (LOS C during the weekday PM peak hour and LOS D during the Saturday midday peak hour). The addition of project-related vehicles at this intersection is based on the anticipated distribution of customers, as developed from the market research analysis (see Response to Comment #44). Based on this analysis, it was estimated that the project would add slightly more vehicles to the project site from northbound Mission Street (23 vehicles during the weekday PM peak hour and 37 vehicles during the Saturday midday peak hour) than from southbound Mission Street (20 vehicles during the weekday PM peak hour and 32 vehicles during the Saturday midday peak hour). As such, the analysis did not assume or conclude that project-related traffic would primarily be southbound on Mission Street.

The weekday counts from the BART feasibility study (*Feasibility Study for an Infill BART Station in San Francisco, at 30th and Mission*, BART, May 2003) referred to in the comment do indicate that, over the course of a 24-hour day, northbound volumes on Mission Street south of Cesar Chavez are greater than southbound volumes. However, the traffic volumes from the BART feasibility study for the PM peak hour (5:00 to 6:00 p.m., which was the basis for the analysis in the Transportation Study for this project), are generally equally split between the northbound and southbound directions (692 vehicles and 670 vehicles, respectively). The peak hour turning movement counts used in the traffic analysis for this project are similar to the traffic volumes in the BART feasibility study in the northbound direction (655 vehicles as compared with the 692 vehicles from the BART feasibility study) and higher in the southbound direction (928 vehicles as compared with the 670 vehicles in the BART feasibility study). It should be noted that the existing traffic volumes were not used to determine the assignment of project-generated trips, but instead information on the geographic location of potential customers was used. For information on the trip distribution assumptions, refer to Responses to Comments #43 and #44.

As indicated on DEIR pages 77 and 78, under 2015 Cumulative conditions, the intersection of Mission/Cortland would operate at LOS F during both the weekday PM and Saturday midday peak hours. The worsening in the operating conditions would primarily be due to the anticipated increase in traffic volumes along northbound and southbound Mission Street, which makes it more difficult for vehicles to make the left turn, and increases the delay to

southbound traffic. The unacceptable operating conditions can be improved by upgrading the traffic signal to create a new protected southbound left-turn phase. The proposed changes to the signalization of this intersection would decrease the amount of green time to the northbound movement, and would increase the amount of green time for the westbound and southbound movements (which currently experience higher delays). As a result, the delays to northbound traffic would somewhat increase; however, these increases would still be lower than those experienced by southbound traffic. This improvement was analyzed in the DEIR, and would result in the intersection operating at LOS C during the weekday PM peak hour and LOS D during the Saturday midday peak hour.

According to DPT, it would be possible to modify the existing signal at the intersection to accommodate the new phase. As noted in Response to Comment #64, DPT has requested that the project sponsor pay for the full cost of this signal upgrade and the project sponsor has agreed to do so.

Comment #72

"Traffic Operations at the Cortland Underpass. This issue was raised in earlier comments and has never been answered. Can Cortland Avenue accommodate the growth in traffic? How much parking will be removed? Does the underpass need to be widened? How much will delay be increased? These questions still need to be answered. It is very clear that additional analyses of the operations in this area are required to verify the findings that no further mitigations are required." (*Charles M. Abrams, President, Abrams Associates*)

Response #72

Two intersections along Cortland Avenue were evaluated in the Transportation Study for intersection operating conditions during the weekday PM and Saturday midday peak hours: Cortland/Andover and Cortland/Folsom. In addition, the intersections at the ends of Cortland Avenue were also evaluated: Mission/Cortland and Bayshore/Cortland. In general, these study intersections would be able to accommodate the increase in traffic associated with the project, since all intersections would continue to operate with acceptable conditions (LOS D or better) during both analysis time periods. At the Cortland Avenue approaches to the intersections at Andover and Folsom, the average delay would increase by less than three seconds per vehicle. Under 2015 Cumulative conditions, all studied intersections were estimated to continue to operate acceptably, except the intersection of Mission/Cortland (which would be improved by DPT and paid for by the project sponsor).

At the U.S. 101 underpass, Cortland Avenue currently has one travel lane and one parking lane in both the eastbound and westbound direction. Based on the results of the traffic analysis, and the increase in traffic volumes with the project, it is anticipated that the current roadway configuration would be sufficient to accommodate project-related traffic volumes, and the underpass would not need to be widened.

To improve operation at the eastbound Cortland Avenue approach to Bayshore Boulevard (which would operate at LOS E under Existing plus Project and 2015 Cumulative conditions, although the intersection as a whole would operate at LOS D), an improvement measure was identified on page 110 of the DEIR that would eliminate two or three on-street parking spaces on the north side of Cortland Avenue, immediately west of Bayshore Boulevard. As indicated in Responses to Comments #63 and #67, DPT has determined that this improvement measure is not desirable due to potential impacts on southbound Bayshore Boulevard right-turning traffic. As a result this improvement measure would not be implemented and the proposed project would not eliminate any parking spaces along Cortland Avenue.

Comment #73

"Access Driveways to the Proposed Home Depot. The amount of peak hour traffic at each driveway needs to be analyzed and presented more clearly. In particular, the proposed driveway out of Home Depot at Cortland is quite substandard, and will result in significant congestion, back-up, and confusion within the garage. The adjacent parking aisles and customer pick-up traffic are all mixed together, and will result in extensive traffic congestion." (*Charles M. Abrams, President, Abrams Associates*)

Response #73

The project site would be served by six driveways: four driveways for customers and employees and two driveways for delivery vehicles (see Figure C&R.6, Site Plan, on page C&R.27, which replaces Figure 2 on DEIR page 28). The main customer/employee entrance and exit for the project site would be located at the eastern side of the existing Bayshore Boulevard and Cortland Avenue intersection and would allow full entry and exit to the site. Secondary customer/employee entrance/exit driveways would be located on Loomis Street and Waterloo Street. An additional secondary exit-only driveway would be located at the north end of the parking garage, and would provide right-turn only egress to northbound

Bayshore Boulevard; this driveway would primarily serve customers leaving the project site from the pick-up area at the front of the store. All of these customer/employee entrance driveways would serve the ground level of the parking garage and would provide access to the parking garage ramp; however, the Waterloo Street driveway would primarily serve the small parking area located underneath and south of the ramp. A separate driveway for delivery access would be located at the northern portion of the project site north of the store, with ingress from Loomis Street and egress to Bayshore Boulevard (right-turn out only).

The project driveway at the intersection of Bayshore/Cortland would be considered the main access point for the project, and would accommodate about 333 inbound and 342 outbound vehicles during the weekday PM peak hour, and 535 inbound and 475 outbound vehicles during the Saturday midday peak hour. With this increase in volumes, the signalized intersection of Bayshore/Cortland would continue to operate under acceptable conditions (LOS D).

The parking garage layout was developed by the project architect, based on an operational assessment of traffic flows into and out of the project site and internal circulation. The layout was refined based on comments by City agencies and the transportation consultant for the DEIR (Wilbur Smith Associates). At the primary driveway at Bayshore/Cortland, the ingress and egress were configured to reduce the potential for vehicular conflicts within the garage. For instance, there would be two entrance lanes, and vehicles entering the garage would travel for a distance within the garage prior to being able to turn into a parking lane. This distance would allow for stacking of about seven vehicles per lane, which would be sufficient to accommodate the average inbound queue within the garage. However, due to the presence of breaks in the internal median, it may be possible that at times vehicles waiting to turn left through the median break may block travel along inbound lanes. Whenever this occurs, it is possible that inbound queues inside the garage could impede access to the upper levels of the parking garage, and these queues may extend onto Bayshore Boulevard, and could potentially impede traffic, transit, and pedestrian flows on Bayshore Boulevard. The proposed parking garage would also have two exit lanes and a right-turn pocket, which would provide sufficient queuing space so that vehicles exiting the garage would not block internal circulation.

Also see Responses to Comments #3 and #6 regarding project design.

Cortland Avenue / Bayshore Boulevard Garage Access

Comment #74

"Current Design Shows Cortland Avenue Feeding into Home Depot Driveway. This will cause an unacceptable level of congestion at this intersection. While the DEIR tries to dismiss this issue with a traffic signal and left-turn lanes, one need only picture the cars queued up to enter the Colma driveway to imagine the kind of congestion that this project will introduce into this major traffic route for Bernal Heights. Why don't any of the alternatives show a different layout, where the driveway does not line up with Cortland?" (*Eve Bach, Arc Ecology Consultant; Barbara Kyle, Resident/No Depot Committee Chair; and Ron Morgan, Bernal Heights Neighborhood Center Community Organizing Coordinator*)

"Page 62, paragraph 2 indicates Cortland Avenue will see an increase in vehicle traffic of 106 vehicles during the weekday and 159 vehicles during the Saturday peak. It is anticipated this will result in an increase in the hourly traffic volumes. This merits further discussion of where vehicle access to the project could be to determine if this will discourage or encourage the use of Cortland Avenue to the project. These vehicles will most likely be residents of the Cortland area, not people who will use the freeways. Just as the commuters travel Cortland, so will residents." (*Shelley Bradford Bell, Planning Commission President*)

"I live in Bernal Heights, and I want to talk to you about traffic. I have two main points that I want to make about traffic, and the fact that information that's in this EIR – it doesn't make these conclusions; just looking at the data shows the traffic impacts are enormous to Bernal Heights. And it also brings up very serious issues with the data and how it was used, that we think results in the traffic impacts being seriously underestimated and under-represented here. As you can see, it is right out of the proposal: The Home Depot plan has its main driveway coming right off the Cortland Avenue. Cortland is our main thoroughfare in Bernal Heights. Bernal Heights is a very pedestrian-friendly community, and while there is – they have added another little access in the back off Loomis, this is the primary driveway (indicating).

"I'm just wondering if any of you have ever been to the Colma Home Depot. Just picture for a moment what the driveway looks like there, and what that parking garage looks like, and that's going to be our reality every time we come down Cortland Avenue, and try to just get out of our neighborhood and go to our work or shopping or other places along there. And that's just something that we think is really problematic. One thing that the traffic study does: A companion study was done; the transportation study – is it evaluates all of the freeways and intersections with what they call 'level of service.' I'm sure you are familiar with this. It grades everything A-B-C-D-E-F, and the City says anything E or F is unacceptable. We actually think that D is also unacceptable, given that we have so few routes to get in and out of Bernal Heights.

"This (indicating) is what the results of the traffic study show: that in fact by the year 2015, all of the freeway on-ramps will be at level F; completely unacceptable. And that means extremely long delays; terrible backups. Many of our other intersections will be at Levels D or E, and in fact the data is somewhat skewed, because what they will do is they will take an average for an intersection, and then – which will lower the grade. There is a Cortland eastbound, and it is going to be a Level E, and it is going to be a serious problem for all of us. They make it look like it is D because they

average eastbound and westbound. So here (indicating) is what it looks like for our whole neighborhood. These are all the intersections; anything that is red is F, and anything yellow is E, and greens are D's, and basically everywhere we go we run into trouble. These little highlights are called 'collision hot spots' that were identified by the City's own traffic study – that are also problematic." (*Barbara Kyle, Resident*)

"The entrance to Home Depot should not be at Cortland and Bayshore. It creates more traffic in my neighborhood. Why not have the entrance on the backside?" (*Amy C. Miller and Virginia Bowen, Residents*)

Response #74

As analyzed in the DEIR, the project's main ingress/egress driveway for customers and employees would be located at the east side of the intersection of Bayshore/Cortland. In addition, a full driveway (both inbound and outbound) would be located on Loomis Street (a minor street that parallels Bayshore Boulevard and connects with Oakdale Avenue and Industrial Street). Secondary access would be provided on Waterloo Street (both inbound and outbound) and on Bayshore Boulevard, north of Cortland Avenue (outbound only).

In general, the location of the primary access point for the project would not substantially affect the volume of traffic that would use Cortland Avenue. Cortland Avenue is one of the few east/west streets in the area, with Cesar Chavez Street to the north of Bernal Heights and Alemany Boulevard, Crescent Avenue, and Silver Avenue to the south of Bernal Heights. As a result, Cortland Avenue would be the most direct route for vehicles traveling to and from the project site from specific locations in San Francisco, such as Bernal Heights, and would also provide connections to the nearby Glen Park, Diamond Heights, Balboa Park, and outer Noe Valley neighborhoods. For access between the project site and the rest of San Francisco, other routes would be more direct and convenient.

Although the relocation of the driveway away from Cortland Avenue would reduce the visibility of the project from vehicles on Cortland Avenue and therefore make it less attractive, Cortland Avenue would still be the most direct route for a certain portion of Home Depot users.

Although the project driveway would be located at the intersection of Bayshore/Cortland, its location would not direct vehicles to use Cortland Avenue as the primary access route to the project. As indicated in the DEIR on page 59, the primary access route to and from the site

would be Bayshore Boulevard, with about 72 percent of all vehicles using northbound and southbound Bayshore Boulevard to access the project driveways. Since Cortland Avenue is a narrow street, with STOP signs, grade changes and relatively slow traffic, it was assumed that drivers from other areas would tend to use other east/west roadways, such as Cesar Chavez Street and Alemany Boulevard.

A number of vehicle access configurations were evaluated during the preliminary design phase. For projects of similar scale as the proposed project, conventional site design practice calls for aligning the major driveway at a signalized intersection. This configuration allows for existing infrastructure to be utilized (would not require the construction of new intersections and traffic signals) and would allow for the most efficient processing of vehicles entering and exiting the project site. Along this section of Bayshore Boulevard, the major arterials are not closely spaced (about 1,400 feet apart); as a result, the only currently signalized intersection in the vicinity of the project site that could be used for the primary access point was Bayshore/Cortland. Although it would be possible to locate the main driveway at another location along Bayshore Boulevard, it would require the establishment of a new intersection and the installation of new traffic signals, crosswalks, and other devices.

Results of traffic analysis indicated that the proposed project would not cause a significant impact at the intersection of Bayshore/Cortland. In addition, secondary access would be provided on Loomis Street (at the east side of the project site), and additional driveways would be located on Waterloo Street and north of Cortland Avenue on Bayshore Boulevard, which would serve to disperse the traffic entering and exiting the project site.

The access plan for the proposed project differs substantially from the Home Depot store in Colma. The Colma location has only one access point and the parking garage was not designed with store access from the upper parking level. As a result, there is often a long queue of vehicles waiting to enter the parking garage, and most customers search for parking on the ground floor. The proposed project would include several design elements that would reduce the potential for these issues. First, the project would have multiple entrance locations – from Bayshore Boulevard, Loomis Street, and Waterloo Street. As a result, the inbound vehicles would be spread throughout three entrance points, and not restricted to a single location. Second, the ground floor of the parking garage has been designed to channel

vehicles to the parking garage ramp to the upper levels. Third, the second level of the parking garage would have a connection and entrance to the mezzanine level of the store where a secondary pick-up location would also be provided. These amenities would enhance the attractiveness of parking in the upper levels of the parking garage. Fourth, Home Depot would request its employees to park on the top level of the garage, in order to allow the lower floors to be used by customers.

The study intersections were analyzed using the standard *Highway Capacity Manual (HCM)* operations methodology, as described on page 48 of the DEIR. The methodology determines the capacity for each lane group approaching the intersection, and the level of service is based on the delay for the various movements with the intersection, consistent with this standard methodology. A combined weighted average delay and level of service are presented for each intersection, which is then used to determine whether a project would have a significant impact. For CEQA purposes, in San Francisco, a signalized intersection is considered to operate at unacceptable conditions when it reaches LOS E or F (an average delay of more than 40 seconds per vehicle). An intersection that operates at LOS D would not be considered to operate with unacceptable conditions, even if the average delay were to approach 40 seconds per vehicle. Under Existing plus Project conditions, the project was determined to have less-than-significant traffic-related impacts at all study intersections.

Information regarding collision hot spots, per the *South Bernal Heights Traffic Calming Study*, is included in Response to Comment #54.

As indicated by Table 2 in the DEIR on page 49, the proposed project would not have significant impacts on intersection operating conditions. However, to address comments on the design of the project site, including the location of the customer/employee driveways for the parking garage, the San Francisco Planning Department, in conjunction with Wilbur Smith Associates and the project sponsor, developed six alternate access plans for the project (to relocate the primary and secondary vehicular entrances and exits) to improve Existing plus Project conditions at the intersection of Bayshore/Cortland. Based on these plans, the project-generated vehicle-trips were reassigned to the local roadway network, and new Existing plus Project Option intersection operating conditions were determined. The results of these analyses were also compared to conditions with the proposed project. In addition,

each option was assessed in terms of circulation and operation, including potential secondary effects to Bayshore Boulevard.²⁸

ACCESS PLANS

The following are the access plans for the proposed project and the six access options. These access plans are summarized in Table C&R.3, page C&R.153, and are shown in Figures C&R.13 through C&R.18 on pages C&R.154 through C&R.159. Note that these options primarily address changes to the customer/employee access plans, and do not affect circulation for deliveries (except Options E and F).

Project

As proposed, the primary vehicular access for customers/employees would be located at the intersection of Bayshore/Cortland (with all movements allowed) and at Loomis Street. Secondary ingress would be provided at Waterloo Street, and secondary egress would be provided at Waterloo Street and Bayshore Boulevard to the north of the main driveway (right-turn only).

Option A

The primary vehicular ingress and egress for customers/employees would be split between Bayshore/Cortland (ingress) and Loomis Street (egress). Secondary ingress would be provided at Loomis Street and Waterloo Street, and secondary egress would be provided at Waterloo Street, and Bayshore Boulevard (right-turn only).

Option B

The primary vehicular ingress and egress for customers/employees would be split between Loomis Street (ingress) and Bayshore/Cortland (egress). Secondary ingress would be provided at Waterloo Street, and secondary egress would be provided at Loomis Street, Waterloo Street, and Bayshore Boulevard (right-turn only).

²⁸ Wilbur Smith Associates memo to Bill Wycko, San Francisco Planning Department – February 8, 2005. This memo is on file and available for public review by appointment at the San Francisco Planning Department, 1660 Mission Street, Fifth Floor, San Francisco, as part of Case File 2001.0062E!.

Table C&R.3
Summary of Access Option Configurations

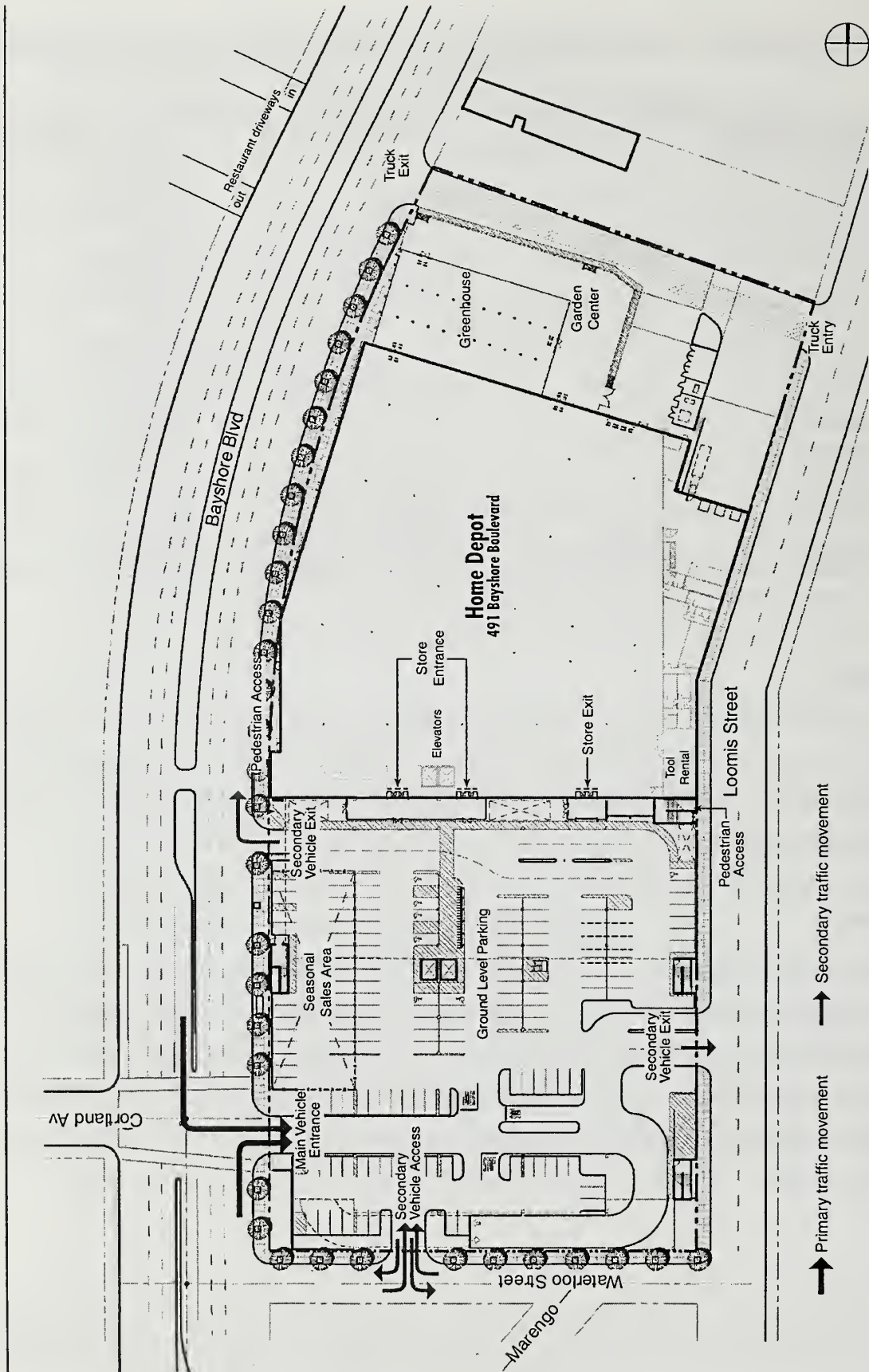
Option	Primary Entrance	Primary Exit	Secondary Entrance	Secondary Exit
Project	Bayshore/Cortland Loomis	Bayshore/Cortland Loomis	Waterloo	Bayshore (rt only) Waterloo
A	Bayshore/Cortland	Loomis	Loomis Waterloo	Bayshore (rt only) Loomis Waterloo
B	Loomis	Bayshore/Cortland	Waterloo	Bayshore (rt only) Loomis Waterloo
C	Loomis	Loomis	Waterloo	Bayshore (rt only) Waterloo
D	Loomis Bayshore	Loomis	Waterloo	Bayshore (rt only) Waterloo
E	Bayshore	Bayshore (rt only)	Bayshore (rt only) Loomis	Bayshore (rt only) Loomis
F	Bayshore	Bayshore	Bayshore (rt only) Loomis	Bayshore (rt only) Loomis

Option C

The primary vehicular access for customers/employees would be located at Loomis Street, with no access provided at Bayshore/Cortland. Secondary ingress would be provided at Waterloo Street, and secondary egress would be provided at Waterloo Street and at Bayshore Boulevard (right-turn only).

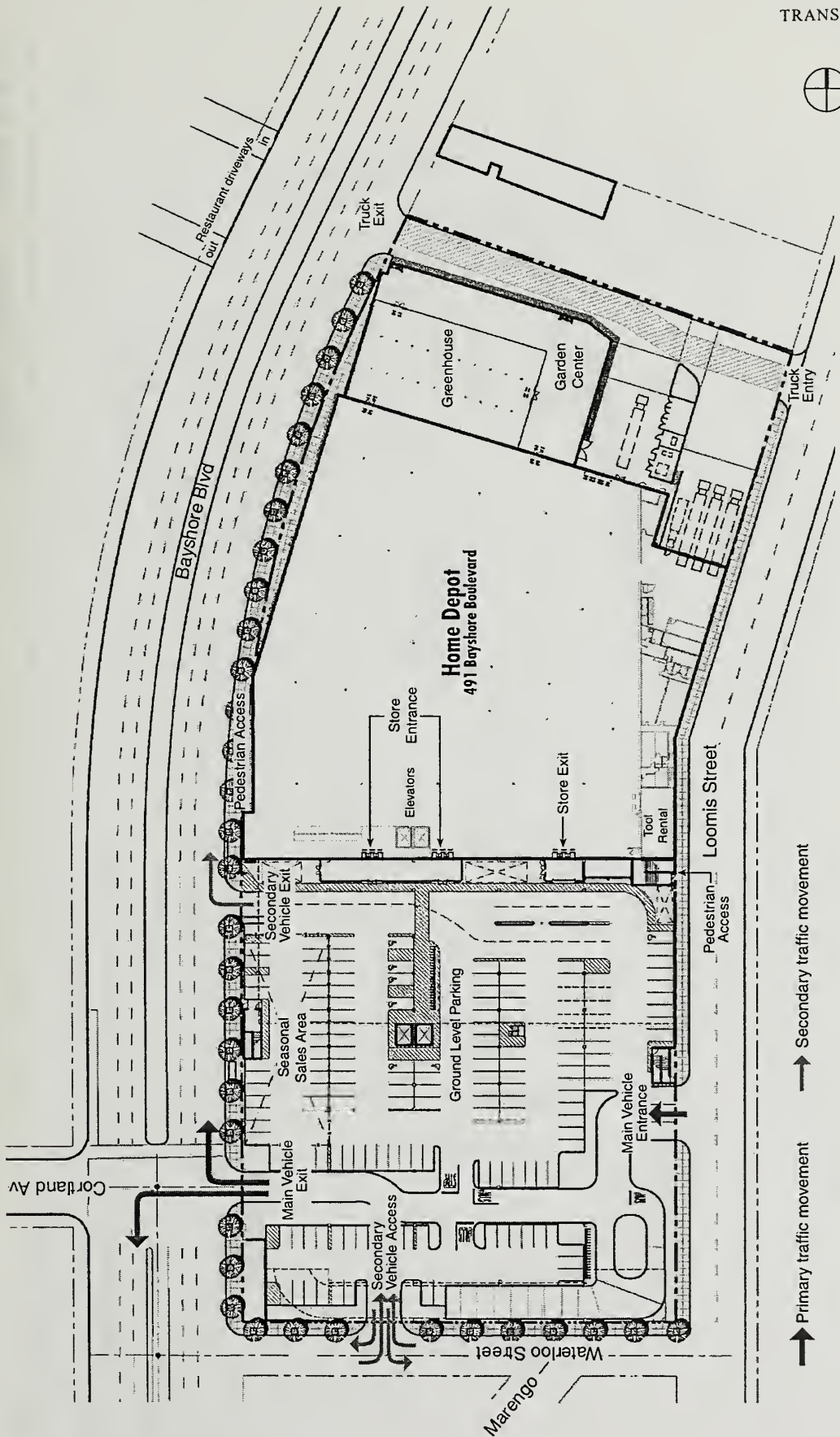
Option D

The primary vehicular access for customers/employees would be located at Loomis Street and at Bayshore Boulevard (north of Cortland Avenue), with no access at Bayshore/Cortland. Secondary ingress and egress would be provided at Waterloo Street. This option would require the establishment of a new southbound left-turn pocket within the Bayshore Boulevard median for access to the Bayshore Boulevard driveway and a new traffic signal at the intersection.



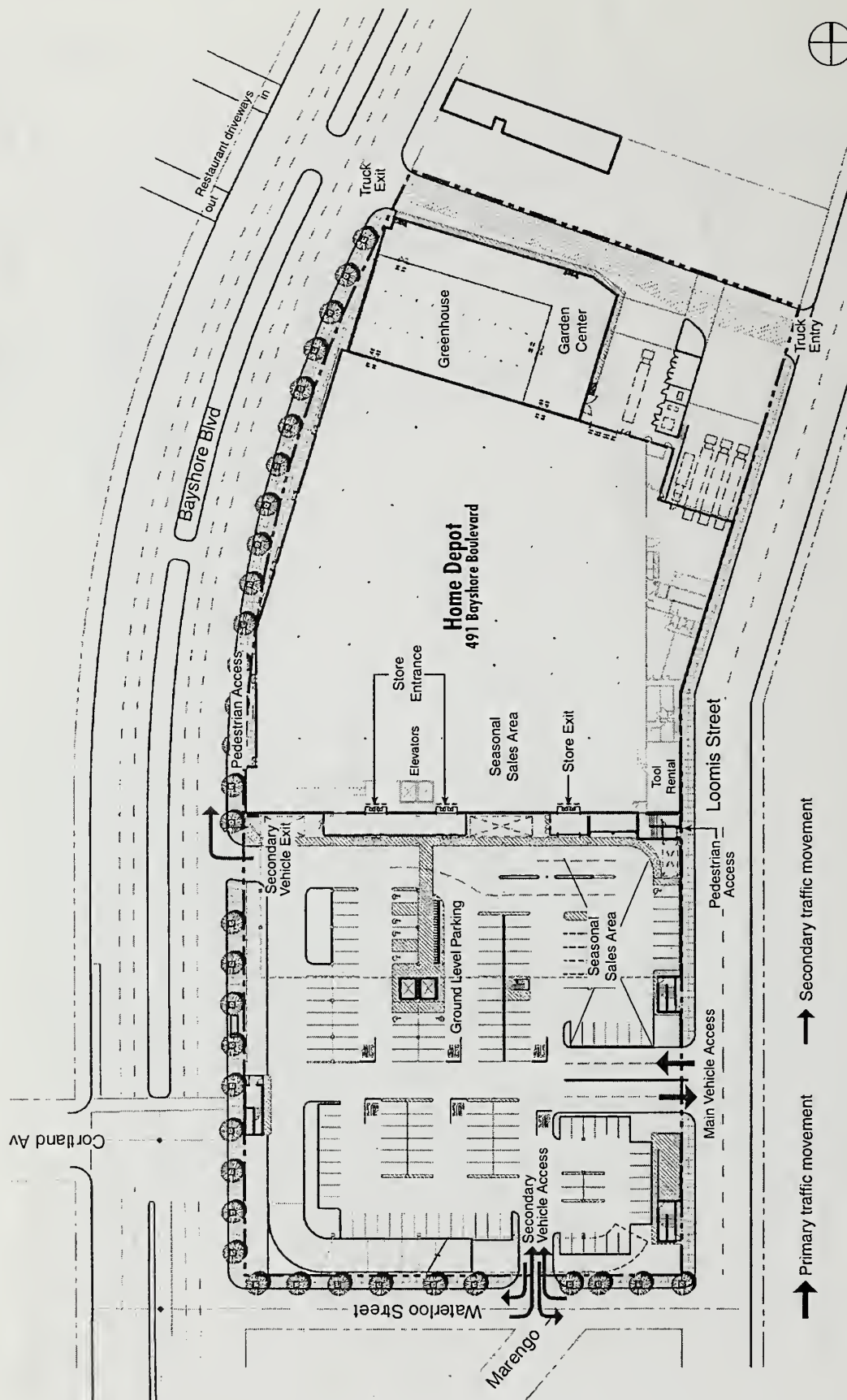
SITE PLAN—OPTION A FIGURE C&R 13

Source: Greenberg Farrow Architecture
6/27/05



SITE PLAN—OPTION B FIGURE C&R 14

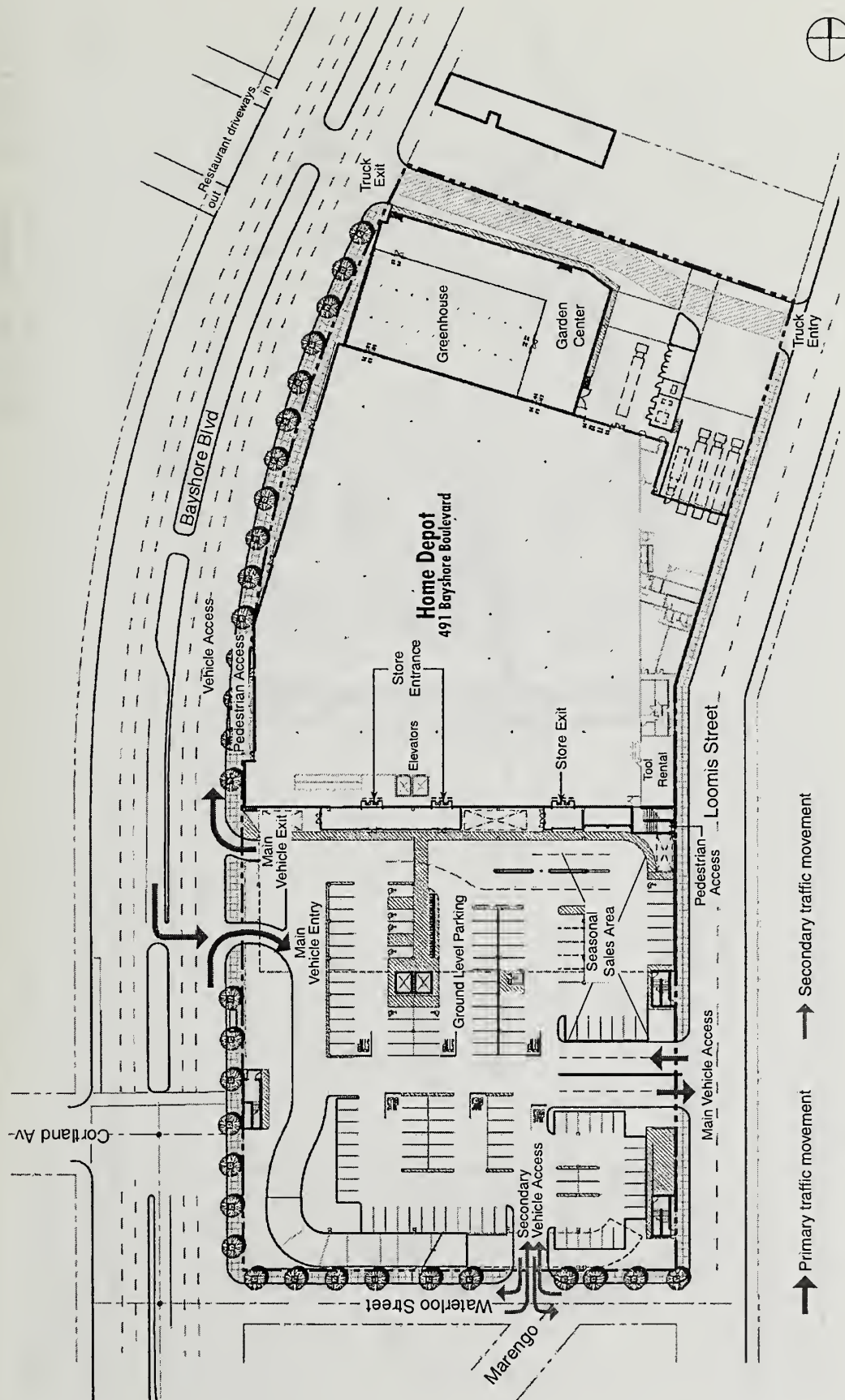
Source: Greenberg Farrow Architecture
6/24/05



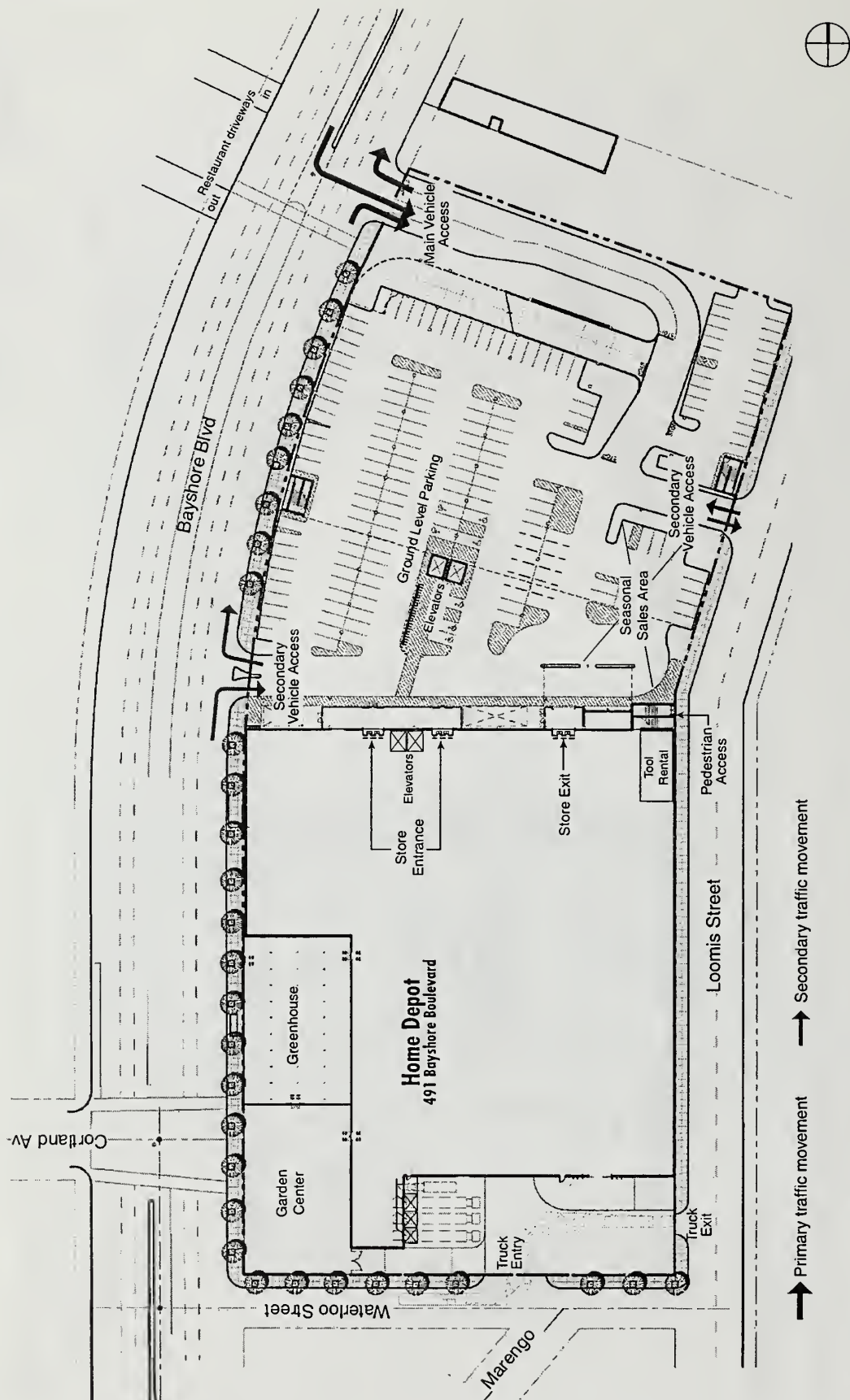
SITE PLAN—OPTION C FIGURE C&R 15

Source: Greenberg Farrow Architecture
6-24-05

SITE PLAN—OPTION D FIGURE C&R 16



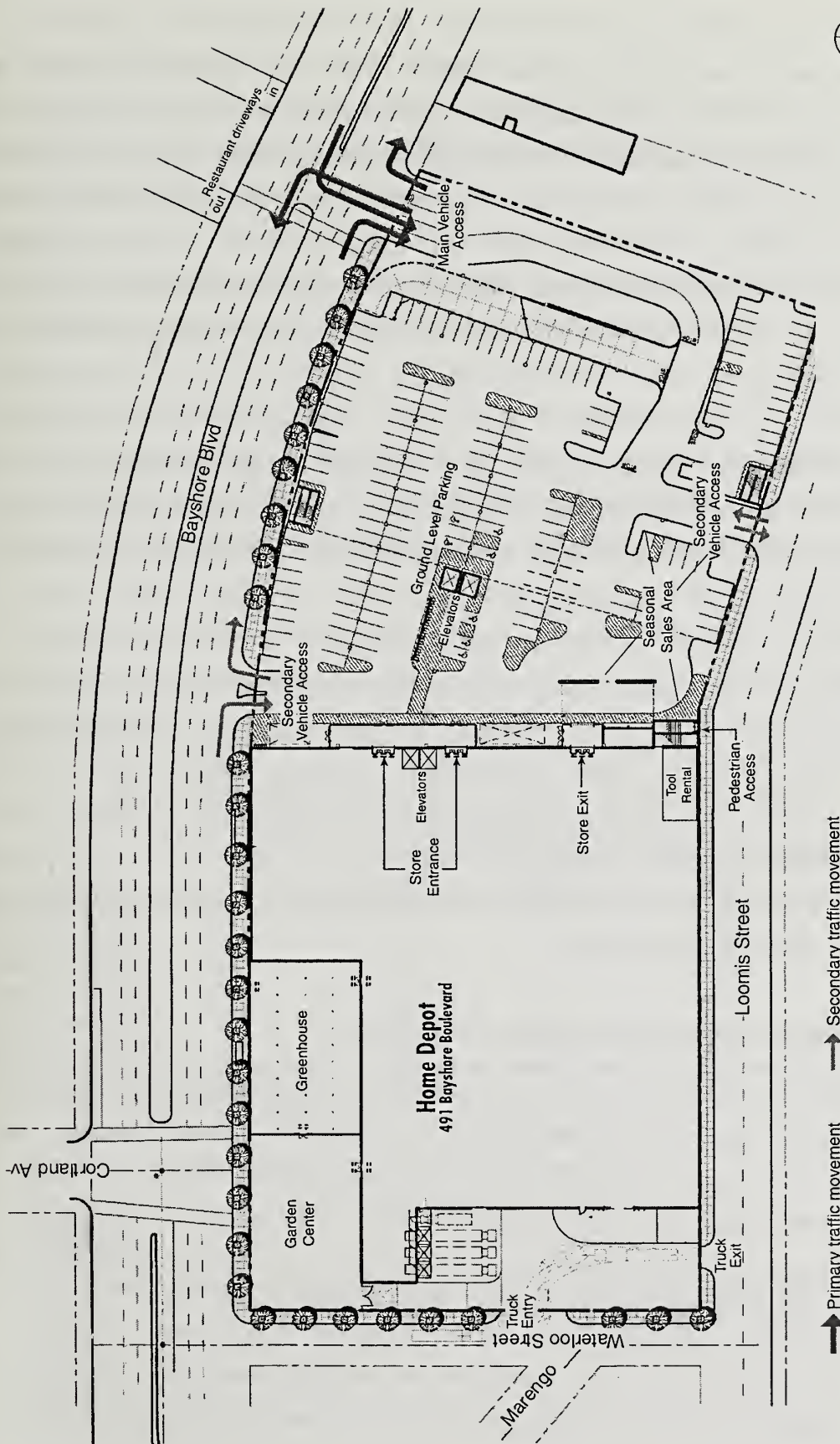
Source: Greenberg Farrow Architecture
6/24/05



Source: Greenberg Farrow Architecture
6/24/05

SITE PLAN—OPTION E FIGURE C&R 17

SITE PLAN—OPTION F FIGURE C&R 18



Source: Greenberg Farrow Architecture
6/24/05

Option E

The currently proposed parking garage would be relocated to the northern section of the project site (similar to configuration with the old Goodman's Lumber). Primary vehicular access for customers/employees would be located at Bayshore Boulevard (north of Cortland Avenue), but left-turns from the Bayshore Boulevard driveway to southbound Bayshore Boulevard would be prohibited. Secondary ingress would be provided at Bayshore Boulevard (right-turn only) and Loomis Street, and secondary egress would be provided at Bayshore Boulevard (right-turn only) and Loomis Street. With this configuration, the loading areas would be relocated to the southeast corner of the site, with delivery trucks entering from Loomis Street and exiting to Waterloo Street. This option would require the establishment of a new southbound left-turn pocket within the Bayshore Boulevard median for access to the Bayshore Boulevard driveway and a new traffic signal at the intersection. In addition, a new crosswalk would need to be established at the south side of the intersection.

Option F

The design and access plan for the project would be the same as with Option E, except that the left-turn from the Bayshore Boulevard driveway to southbound Bayshore Boulevard would be permitted. This option would require the establishment of a new southbound left-turn pocket within the Bayshore Boulevard median for access to the Bayshore Boulevard driveway and a new traffic signal at the intersection. In addition, a new crosswalk would need to be established at the south side of the intersection, with an exclusive pedestrian walk phase (with pedestrian actuation).

INTERSECTION OPERATING CONDITIONS

For each access option, the inbound and outbound vehicle-trips generated by the project (as documented in the DEIR) were reassigned to the local roadway network depending upon the changes to the ingress and egress plans. For ingress/egress that would not change (e.g., ingress with Option A), the traffic assignments would be the same as with the project. For ingress/egress that would change (e.g., egress with Option A), it was assumed that vehicles would reroute to the nearest and most-convenient driveway.

In addition, it was assumed that the origin/destination of each vehicle-trip would not change from those developed for the proposed project. As a result, only the study intersections in the immediate vicinity of the project site would be affected by the rerouting of vehicles for the access options (including Bayshore/Oakdale, Bayshore/Cortland, Bayshore/Industrial, Oakdale/Loomis, and Industrial/ Loomis).

The following tables present the results of the intersection operations analysis for the project and the six options for the weekday PM and Saturday midday peak hours.

Project

Under Existing plus Project conditions, all study intersections would operate acceptably (LOS D or better) during the weekday PM and Saturday midday peak hours as indicated by Table 2 in the DEIR on page 49. However, there would be some congestion and queuing issues at the intersection of Bayshore/Cortland (primarily along the eastbound Cortland Avenue approach), due to the substantial increase in traffic volumes and the changes to the traffic signal to accommodate the new vehicle movements to and from the project site.

Table C&R.4 Intersection Operations Analysis Results for the Proposed Project Weekday PM and Saturday Midday Peak Hours				
Intersection	Weekday PM Peak Hour		Saturday Midday Peak Hour	
	Delay	LOS	Delay	LOS
Bayshore/Oakdale	29.7	D	18.0	C
Bayshore/Driveway	—	—	—	—
Bayshore/Cortland	27.4	D	34.6	D
Bayshore/Industrial	33.0	D	21.9	C
Oakdale/Loomis ⁽¹⁾	16.6	C	8.7	B
Industrial/Loomis ⁽¹⁾	8.6	B	5.6	B

Source: Wilbur Smith Associates, February 2005

Notes:

⁽¹⁾ Unsignalized intersection – delay and LOS presented for worst approach

Option A

Due to the rerouting of outbound traffic from the Cortland/Bayshore driveway to Loomis Street, the intersection of Bayshore/Cortland would have reduced traffic volumes and a simplified signal timing plan (the new westbound signal phase, which was added for the project, would be eliminated). As a result, the intersection would operate with a better level

of service than with the project configuration during both the weekday PM and Saturday midday peak hours. Although Option A would result in substantially higher traffic volumes at the intersection of Industrial/Loomis (since most vehicles leaving the project site would need to use Loomis Street), most of these vehicles would be turning right from southbound Loomis Street to westbound Industrial Street and therefore would not be subject to long delays. Overall, all other study intersections would operate similar to the Existing plus Project conditions during both analysis periods, and Option A would not result in any new traffic impacts.

Table C&R.5 Intersection Operations Analysis Results for Circulation Option A Weekday PM and Saturday Midday Peak Hours				
Intersection	Weekday PM Peak Hour		Saturday Midday Peak Hour	
	Delay	LOS	Delay	LOS
Bayshore/Oakdale	28.1	D	17.4	C
Bayshore/Driveway	—	—	—	—
Bayshore/Cortland	18.0	C	21.0	C
Bayshore/Industrial	33.2	D	24.1	C
Oakdale/Loomis ⁽¹⁾	21.6	D	13.0	C
Industrial/Loomis ⁽¹⁾	9.1	B	7.1	B

Source: Wilbur Smith Associates, February 2005

Notes:

⁽¹⁾ Unsignalized intersection – delay and LOS presented for worst approach

Option B

All intersections would operate with similar levels of service as with the project configuration, except the intersection of Industrial/Loomis. At this intersection, there would be a substantial increase in vehicles turning left from eastbound Industrial Street to northbound Loomis Street to enter the project site, in addition to the high existing eastbound and westbound traffic volumes. As a result, the southbound approach at this intersection would worsen to LOS F during the weekday PM peak hour (the northbound approach currently operates at LOS F), resulting in a new traffic impact with Option B. To improve operations at this intersection, a new traffic signal would be required, and the southbound approach would need to be restriped to provide two lanes (which would require the elimination of about five on-street parking spaces).

At the intersection of Industrial/Loomis, the new eastbound left-turning traffic could be accommodated either through a permitted/protected left-turn signal phase which would allow for any queues to clear at the end of each signal cycle, or with a left-turn pocket with an exclusive left-turn signal phase (note that it would be possible to create a left-turn pocket at this location by eliminating on-street parking further east on Industrial Street and by shifting the eastbound travel lanes to the south). However, the queues that would develop during the weekday and weekend peak hours of activity were estimated to be between 10 and 25 vehicles, which would spill back past the left-turn pocket (if provided) and would extend back to the intersection of Bayshore/Industrial.

A detailed traffic simulation analysis would be needed at this location to determine the signal timing and coordination scheme between the traffic signals at the intersections of Bayshore/Industrial and Industrial/Loomis, and to determine the extent of the queues in both directions between the intersections. This analysis would need to be conducted prior to the approval of Option B, and would be necessary to refine the design of the street and the traffic signals. It should be noted that if sufficient space is not available between the two intersections to accommodate the queuing, Option B would not be considered feasible.

Table C&R.6 Intersection Operations Analysis Results for Circulation Option B Weekday PM and Saturday Midday Peak Hours				
Intersection	Weekday PM Peak Hour		Saturday Midday Peak Hour	
	Delay	LOS	Delay	LOS
Bayshore/Oakdale	32.1	D	24.3	C
Bayshore/Driveway	—	—	—	—
Bayshore/Cortland	27.6	D	32.6	D
Bayshore/Industrial	32.8	D	22.2	C
Oakdale/Loomis ⁽¹⁾	17.1	C	9.8	B
Industrial/Loomis ⁽¹⁾	>45	F	18.7	C

Source: Wilbur Smith Associates, February 2005

Notes:

⁽¹⁾ Unsignalized intersection – delay and LOS presented for worst approach

Option C

Since the primary vehicular access would be moved to Loomis Street and further north on Bayshore Boulevard, the intersection of Bayshore/Cortland would continue to have the same

configuration as existing, and the intersection operations would be similar to Existing conditions. With limited access at Bayshore Boulevard, most vehicles destined to and from the site would need to use Loomis Street, Oakdale Avenue, and Industrial Street. As a result, the southbound approach at the intersection of Industrial/Loomis would worsen to LOS E during the weekday PM peak hour (the northbound approach currently operates at LOS F), resulting in a new traffic impact with Option C. To improve operations at this intersection, a new traffic signal would be required, and the southbound approach would need to be restriped to provide two lanes (which would require the elimination of about five on-street parking spaces).

At the intersection of Industrial/Loomis, the new eastbound left-turning traffic could be accommodated either through a permitted/protected left-turn signal phase which would allow any queues to clear at the end of each signal cycle, or with a left-turn pocket with an exclusive left-turn signal phase (note that it would be possible to create an eastbound left-turn pocket at this location by eliminating on-street parking further east on Industrial Street and shifting the eastbound travel lanes to the south). However, the queues that may develop during the weekday and weekend peak hours of activity were estimated to be between 10 and 25 vehicles, which would spill back past the left-turn pocket (if provided) and would extend back to the intersection of Bayshore/Industrial.

A detailed traffic simulation analysis would be needed at this location to determine the signal timing and coordination scheme between the traffic signals at the intersections of Bayshore/Industrial and Industrial/Loomis, and to determine the extend of the queues in both directions between the intersections. This analysis would need to be conducted prior to the approval of Option C, and would be necessary to refine the design of the street and the traffic signals. It should be noted that if sufficient space is not available between the two intersections to accommodate the queuing, Option C would not be considered feasible.

<p align="center">Table C&R.7 Intersection Operations Analysis Results for Circulation Option C Weekday PM and Saturday Midday Peak Hours</p>				
Intersection	Weekday PM Peak Hour		Saturday Midday Peak Hour	
	Delay	LOS	Delay	LOS
Bayshore/Oakdale	32.4	D	25.9	D
Bayshore/Driveway	—	—	—	—
Bayshore/Cortland	12.8	B	12.2	B
Bayshore/Industrial	31.3	D	23.0	C
Oakdale/Loomis ⁽¹⁾	18.7	C	10.5	C
Industrial/Loomis ⁽¹⁾	32.7	E	13.4	C

Source: Wilbur Smith Associates, February 2005

Notes:

⁽¹⁾ Unsignalized intersection – delay and LOS presented for worst approach

Option D

Since the primary vehicular access would be moved to Loomis Street and further north on Bayshore Boulevard, the intersection of Bayshore/Cortland would continue to have the same configuration as existing, and the intersection operations would be similar to Existing conditions. To accommodate the ingress from southbound Bayshore Boulevard to the project site, a left-turn pocket would need to be established within the Bayshore Boulevard median. Since inbound traffic would be split between the various project driveways (vehicles approaching from the north would likely use the Bayshore driveway, vehicles approaching from the south would likely use the Waterloo or Bayshore driveways, and vehicles approaching from the east and west would likely use the Loomis driveway), traffic would be relatively evenly split between all the access points. Overall, all study intersections would operate similar to or better than under the Existing plus Project conditions during both analysis periods, and Option D would not result in any new traffic impacts. Due to the relatively short distance between the intersection of Bayshore/Cortland and the Bayshore driveway (about 150 feet), the design and operation of the traffic signals would need to be coordinated.

Table C&R.8 Intersection Operations Analysis Results for Circulation Option D Weekday PM and Saturday Midday Peak Hours				
Intersection	Weekday PM Peak Hour		Saturday Midday Peak Hour	
	Delay	LOS	Delay	LOS
Bayshore/Oakdale	29.8	D	18.5	C
Bayshore/Driveway	3.3	A	5.2	B
Bayshore/Cortland	12.6	B	11.7	B
Bayshore/Industrial	29.6	D	22.1	C
Oakdale/Loomis ⁽¹⁾	17.0	C	11.6	C
Industrial/Loomis ⁽¹⁾	11.9	C	8.3	B

Source: Wilbur Smith Associates, February 2005

Notes:

⁽¹⁾ Unsignalized intersection – delay and LOS presented for worst approach

Option E

With the primary vehicular access on Bayshore Boulevard to the north of Cortland Avenue and on Loomis Street, the intersection of Bayshore/Cortland would continue to have the same configuration as existing, and the intersection operations would be similar to Existing conditions. To accommodate the ingress from southbound Bayshore Boulevard to the project site, a left-turn pocket would need to be established within the Bayshore Boulevard median, with a new traffic signal. Overall, all study intersections would operate similar to or better than under the Existing plus Project conditions during both analysis periods, and Option E would not result in any new traffic impacts.

Table C&R.9 Intersection Operations Analysis Results for Circulation Option E Weekday PM and Saturday Midday Peak Hours				
Intersection	Weekday PM Peak Hour		Saturday Midday Peak Hour	
	Delay	LOS	Delay	LOS
Bayshore/Oakdale	30.0	D	18.2	C
Bayshore/Driveway	3.3	A	5.1	B
Bayshore/Cortland	12.4	B	11.2	B
Bayshore/Industrial	33.2	D	24.2	C
Oakdale/Loomis ⁽¹⁾	19.3	C	12.4	C
Industrial/Loomis ⁽¹⁾	9.0	B	6.9	B

Source: Wilbur Smith Associates, February 2005

Notes:

⁽¹⁾ Unsignalized intersection – delay and LOS presented for worst approach

Option F

With the primary vehicular access on Bayshore Boulevard to the north of Cortland Avenue and on Loomis Street, the intersection of Bayshore/Cortland would continue to have the same configuration as existing, and the intersection operations would be similar to Existing conditions. To accommodate the ingress from southbound Bayshore Boulevard to the project site, a left-turn pocket would need to be established within the Bayshore Boulevard median, with a new traffic signal. In addition, since left-turns would be allowed from the project driveway to southbound Bayshore Boulevard, conditions along Industrial Street and Oakdale Avenue would be somewhat better than with Option E. Overall, all study intersections would operate similar to or better than under the Existing plus Project conditions during both analysis periods, and Option F would not result in any new traffic impacts.

Table C&R.10 Intersection Operations Analysis Results for Circulation Option F Weekday PM and Saturday Midday Peak Hours				
Intersection	Weekday PM Peak Hour		Saturday Midday Peak Hour	
	Delay	LOS	Delay	LOS
Bayshore/Oakdale	30.0	D	18.2	C
Bayshore/Driveway	11.7	B	15.0	C
Bayshore/Cortland	12.8	B	12.6	B
Bayshore/Industrial	32.9	D	21.9	C
Oakdale/Loomis ⁽¹⁾	13.2	C	10.6	C
Industrial/Loomis ⁽¹⁾	9.6	B	6.1	B

Source: Wilbur Smith Associates, February 2005

Notes:

⁽¹⁾ Unsignalized intersection – delay and LOS presented for worst approach

SUMMARY OF INTERSECTION OPERATIONS ANALYSIS

With the access configuration associated with Options A, D, E, and F, all study inter-sections would continue to operate with similar conditions as with the proposed project, and there would be no additional transportation-related impacts. In addition, conditions at Bayshore/Cortland would be better than with the proposed project.

It should be noted that with Options D, E, and F, a new southbound left-turn from Bayshore Boulevard into the project site would need to be established (within the existing median), and a new traffic signal would need to be installed. Signalization of the new intersection of

Bayshore Boulevard with the driveway would need to be coordinated with the nearby intersections at Bayshore/Oakdale and Bayshore/Cortland, especially with respect to providing sufficient queuing distance between the new intersection and Cortland Avenue. With Option A, the southbound left-turn pocket would be located at the intersection of Bayshore/Cortland (as with the project), and would require adjustments to the signalization plan.

With Options B and C, the intersection of Industrial/Loomis would be considered to operate with unacceptable conditions (the two STOP-controlled approaches would operate at LOS E/F) under the Existing plus Project Option conditions for the weekday PM peak hour. To improve conditions at this intersection, a new traffic signal would be necessary (note that the intersection volumes would meet signal warrants) and the southbound approach would need to be restriped to provide two travel lanes. However, due to the potential for lengthy queues at the eastbound approach (vehicles turning left onto Loomis Street to access the project site), additional analysis of Industrial Street would be necessary to focus on signalization, signal coordination, and design issues. If these issues cannot be sufficiently addressed, both Options B and C may be determined to not be feasible, due to the potential for substantial effects to circulation on Industrial Street and Bayshore Boulevard.

DETAILED ASSESSMENTS

To supplement the intersection operations analysis of the access options, a detailed assessment for each option was conducted. The purpose of this assessment was to refine the plans (such as length of the new southbound left-turn pockets), and to ensure that each option could be implemented without resulting in additional impacts to Bayshore Boulevard and local traffic conditions (such as driveway locations and signalization plans along Bayshore Boulevard). The results of the queuing assessment at the new southbound left-turn pockets are presented in the following tables.

Option A

With Option A, a southbound left-turn would be established from Bayshore Boulevard to the Cortland Avenue driveway. This left-turn pocket would be within the existing center left-turn median of Bayshore Boulevard, and would require the modification to the existing traffic

signal at the intersection of Bayshore/Cortland. Configuration of the left-turn pocket would be the same as with the project.

Design of Bayshore Southbound Left-Turn Pocket: Although the left-turn pocket from southbound Bayshore Boulevard would be similar to that with the project, the elimination of the westbound phase (for vehicles leaving the garage) would result in shorter cycle lengths and therefore shorter queues. It was estimated that at the southbound left-turn, the maximum (95th percentile) queue would be about 80 feet during the weekday PM peak hour, 125 feet during the Saturday midday peak hour, and 100 feet during the weekday peak hour of activity. As such, the left-turn pocket would need to be about 125 feet in length to accommodate the theoretical maximum queues that would develop.

Table C&R.11			
Results for Option A – Southbound Left-Turn to Cortland Driveway			
Time Period	Volume	Average Queue Length	Maximum Queue Length
Weekday PM	95	55	80
Saturday Midday	155	85	125
Weekday Peak Hour of Activity	120	65	100

Source: Wilbur Smith Associates, February 2005

Notes:

Queue length assumes an average of 22 feet per vehicle.

Maximum Queue = 95th percentile queue, theoretical maximum queue used for design of turn pockets.

The establishment of the proposed left-turn pocket would continue to restrict access from northbound Bayshore Boulevard to the linear off-street parking lot in front of the Floorcraft Kitchen Appliance Center at 470 Bayshore Boulevard (although since the pocket would be shorter, fewer spaces would be affected). As such, a northbound U-turn pocket would need to be created (as previously discussed with the project). This pocket would be located directly north of the southbound left-turn pocket and would allow U-turns to occur mid-block, thereby reducing the effect on access from northbound Bayshore Boulevard to the uses along the west side of the street.

Parking: Option A would allow for the provision of about 536 parking spaces (including 147 spaces on the ground level, 139 spaces on the second level and 250 spaces on the third level),

which would be three spaces less than with the proposed project (539 spaces). As such, Option A would not provide sufficient spaces to accommodate the maximum weekday and weekend parking demand (502 spaces and 539 spaces, respectively). Assuming a 90 percent effective capacity of the parking garage (which would correspond to an effective supply of 482 spaces), there would continue to be a parking shortfall during the peak hours of peak days.

Other Queuing/Design Issues: Since the inbound and outbound traffic would be split between Bayshore Boulevard and Loomis Street, there would be the reduced potential for internal or external circulation conflicts. Since the Bayshore driveway would accommodate only entering traffic, vehicles inside the garage turning left into the ground floor parking area would not affect inbound travel. Due to the configuration of the garage up/down ramps and the connection to the Loomis Street driveway, it would be somewhat difficult for vehicles parked on the upper levels of the garage to access the ground floor customer pick-up area. As such, there may be some congestion inside the garage near the Loomis driveway; however, this configuration would not substantially affect ingress and egress operations. Overall, it is anticipated that Option A would have a minimal affect to operations on Bayshore Boulevard or Loomis Street.

Option B

With Option B, the primary entrance would be from Loomis Street, and there would be no ingress from Bayshore Boulevard. As such, the configuration of Bayshore Boulevard would not change from current conditions. However, since the Cortland Avenue driveway would be the primary exit, the intersection of Bayshore/Cortland would need to be modified to provide a new westbound approach.

Parking: Option B would allow for the provision of about 548 parking spaces (including 159 spaces on the ground level, 139 spaces on the second level and 250 spaces on the third level), which would be nine spaces more than with the proposed project (539 spaces). As such, Option B would provide sufficient spaces to accommodate the maximum weekday and weekend parking demand (502 spaces and 539 spaces, respectively). However, assuming a

90 percent effective capacity of the parking garage (which would correspond to an effective supply of 493 spaces), there would continue to be a parking shortfall during the peak hours of peak days.

Other Queuing/Design Issues: Since the inbound and outbound traffic would be split between the Loomis Street and Bayshore Boulevard, respectively, there would be no major internal or external circulation conflicts. The inbound driveway from Loomis Street would provide two lanes and a direct connection to the garage ramp; however, vehicles destined to the ground floor customer pick-up area may cross directly in front of these inbound vehicles, which would result in minor congestion at the driveway. The outbound driveway to Bayshore Boulevard would have over 150 feet of queuing space and would be able to accommodate queues that would form at the exit. Overall, it is anticipated that Option B would have a minimal affect to operations on Bayshore Boulevard or Loomis Street.

Since all inbound traffic would need to access the garage from Loomis Street (with the exception of the secondary access point on Waterloo Street), it would be complicated to devise signage to direct access to the project site (since most of the inbound traffic would travel to the project site on Bayshore Boulevard), and an extensive signage and information program would need to be developed. As a result, there may be additional congestion at the intersections of Bayshore/Oakdale and Bayshore/Industrial, since vehicles may drive past the project site and then turn onto Oakdale Avenue or Industrial Street to access the Loomis driveway.

Due to the high traffic volume destined to the project site from Industrial Street to Loomis Street, there would be the likelihood for substantial queuing issues between the intersections of Bayshore/Industrial and Industrial/Loomis. Potential changes to the intersection of Industrial/Loomis, including signalization, signal phasing plans, and a left-turn pocket may not be adequate to sufficiently process vehicles and limit the length of the queues. As such, additional analysis of the configuration of Industrial Street and the new traffic signal would be necessary, and Option B may not be considered feasible.

Table C&R.12 Results for Option B – Eastbound Left-Turn from Industrial to Loomis			
Time Period	Volume	Average Queue Length	Maximum Queue Length
Weekday PM	330	120	180
Saturday Midday	540	195	340
Weekday Peak Hour of Activity	400	145	295

Source: Wilbur Smith Associates, February 2005

Notes:

Queue length assumes an average of 22 feet per vehicle.

Maximum Queue = 95th percentile queue, theoretical maximum queue used for design of turn pockets.

Volume includes existing and project-generated traffic.

Option C

With Option C, the primary entrance and exit would be from Loomis Street, and there would be no access at the intersection of Bayshore/Cortland (only a right-turn out to Bayshore Boulevard would be provided). As such, the configuration of Bayshore Boulevard and the intersection of Bayshore/Cortland would not change from current conditions.

Parking: Option C would allow for the provision of about 539 parking spaces (including 150 spaces on the ground level, 139 spaces on the second level and 250 spaces on the third level), which would be the same number of spaces as with the proposed project (539 spaces). As such, Option C would provide sufficient spaces to accommodate the maximum weekday and weekend parking demand (502 spaces and 539 spaces, respectively). However, assuming a 90 percent effective capacity of the parking garage (which would correspond to an effective supply of 485 spaces), there would continue to be a parking shortfall during the peak hours of peak days.

Other Queuing/Design Issues: Since all inbound and outbound traffic would use Loomis Street, there would be a substantial amount of activity at the Loomis Street driveway. In addition, since the garage up/down ramp would be located at the western end of the site, vehicles would need to transverse the entire width of the parking garage in order to access the driveway. As a result, there would be potential for conflicts between vehicles entering and exiting the project site, turning into and out of parking aisles, and attempting to access the

ground floor customer pick-up area. In addition, the outbound driveway to Loomis Street would have about 90 feet of storage space per lane (180 feet total), which could accommodate about eight vehicles. Although there are currently relatively low traffic volumes on Loomis Street, the new vehicles turning into the project site from northbound and southbound Loomis Street could block vehicles attempting to exit the project site. As such, the queues that would form at the exit driveways would likely extend past the storage space, which would substantially impede internal circulation. However, these circulation concerns would primarily be within the project site and would only have a minimal affect to operations on Loomis Street.

Since all inbound traffic would need to access the garage from Loomis Street (with the exception of the secondary ingress point on Waterloo Street), it would be complicated to devise signage to direct access to the project site (since most of the inbound traffic would travel to the project site on Bayshore Boulevard), and an extensive signage and information program would need to be developed). As a result, there may be additional congestion at the intersections of Bayshore/Oakdale and Bayshore/Industrial, since vehicles may drive past the project site and then turn onto Oakdale Avenue or Industrial Street to access the Loomis driveway.

Due to the high volume of traffic destined to the project site from Industrial Street to Loomis Street, there would be the likelihood for substantial queuing issues between the intersections of Bayshore/Industrial and Industrial/Loomis. Potential changes to the intersection of Industrial/Loomis, including signalization, signal phasing plans, and a left-turn pocket may not be adequate to sufficiently process vehicles and limit the length of the queues. As such, additional analysis of the configuration of Industrial Street and the new traffic signal would be necessary, and Option C may not be considered feasible.

Table C&R.13 Results for Option C – Eastbound Left-Turn from Industrial to Loomis			
Time Period	Volume	Average Queue Length	Maximum Queue Length
Weekday PM	320	120	175
Saturday Midday	525	195	325
Weekday Peak Hour of Activity	390	145	215

Source: Wilbur Smith Associates, February 2005

Notes:

Queue length assumes an average of 22 feet per vehicle.

Maximum Queue = 95th percentile queue, theoretical maximum queue used for design of turn pockets.

Volume includes existing and project-generated traffic.

Option D

With Option D, a new southbound left-turn would be established from Bayshore Boulevard to the middle of the project site (between the parking garage and the store). This left-turn pocket would be within the existing center left-turn median of Bayshore Boulevard, and would be located about 150 feet north of the Bayshore/Cortland intersection. The new left-turn movement would require the establishment of a new traffic signal on Bayshore Boulevard, which would need to be coordinated with the nearby traffic signal at Cortland Avenue.

Design of Bayshore Southbound Left-Turn Pocket: For this analysis, it was assumed that the new traffic signal at the project driveway would be coordinated with the nearby signal at Bayshore/Cortland, so that northbound and southbound Bayshore Boulevard traffic would be able to travel through the two intersections with minimal delays, and the southbound left-turn phase would occur at the same time as the eastbound Cortland Avenue phase. With this signalization plan, it was estimated that at the southbound left-turn, the maximum (95th percentile) queue would be about 60 feet during the weekday PM peak hour, 85 feet during the Saturday midday peak hour, and 70 feet during the weekday peak hour of activity. As such, the left-turn pocket would need to be about 100 feet in length to accommodate the theoretical maximum queues that would develop.

Table C&R.14 Results for Option D – Southbound Left-Turn to Bayshore Driveway			
Time Period	Volume	Average Queue Length	Maximum Queue Length
Weekday PM	85	40	60
Saturday MIDDAY	135	55	85
Weekday Peak Hour of Activity	105	50	75

Source: Wilbur Smith Associates, February 2005

Notes:

Queue length assumes an average of 22 feet per vehicle.

Maximum Queue = 95th percentile queue, theoretical maximum queue used for design of turn pockets.

The establishment of the proposed left-turn pocket would continue to restrict access from northbound Bayshore Boulevard to the linear off-street parking lot in front of the Floorcraft Kitchen Appliance Center at 470 Bayshore Boulevard. In addition, the pocket would affect vehicular access to driveways for the businesses at 418 Bayshore Boulevard and 430 Bayshore Boulevard. As such, a northbound U-turn pocket would need to be created (as previously discussed with the proposed project). This pocket would be located directly north of the southbound left-turn pocket and would allow U-turns to occur mid-block, thereby reducing the effect on access from northbound Bayshore Boulevard to the uses along the west side of the street.

Parking: Option D would allow for the provision of about 523 parking spaces (including 134 spaces on the ground level, 139 spaces on the second level and 250 spaces on the third level), which would be 16 spaces less than with the proposed project (539 spaces). As such, Option D would almost provide sufficient spaces to accommodate the maximum weekday and weekend parking demand (502 spaces and 539 spaces, respectively). Assuming a 90 percent effective capacity of the parking garage (which would correspond to an effective supply of 470 spaces), there would continue to be a parking shortfall during the peak hours of peak days.

Other Queuing/Design Issues: With Option D, there would be two adjacent driveways on Bayshore Boulevard, with the northern driveway serving vehicles leaving the store (right-turn only), and the southern driveway serving vehicles entering the store. Due to the amount of activity at this location (inbound and outbound traffic, vehicles circulating to access the

customer pick-up area, and nearby parking spaces), there would be queuing issues and the potential for conflicts between vehicles. The splitting of the Bayshore Boulevard access into separate ingress and egress driveways and the elimination of the nearby parking spaces would improve operations and reduce the potential for conflicts. However, multiple driveways along Bayshore Boulevard would worsen conditions for pedestrians, and they would have cross separate traffic streams at locations where vehicular traffic would be uncontrolled. Overall, it is anticipated that Option D would have a minimal affect to operations on Bayshore Boulevard or Loomis Street, but could result in difficulties to internal circulation and pedestrians along Bayshore Boulevard.

Option E

With Option E, a new southbound left-turn would be established from Bayshore Boulevard to the north end of the project site. This left-turn pocket would be within the existing median of Bayshore Boulevard, and would be located mid-block between the intersections of Bayshore/Cortland and Bayshore/Oakdale (about 700 feet north of Cortland Avenue and about 650 feet south of Oakdale Avenue). The new left-turn movement would require the establishment of a new traffic signal on Bayshore Boulevard.

Design of Bayshore Southbound Left-Turn Pocket: Since the new driveway would be located a relatively long distance between the intersections of Bayshore/Cortland and Bayshore/Oakdale (about 700 feet and 650 feet respectively), the new traffic signal would not need to be coordinated with the other signals. However, sufficient pedestrian crossing time would need to be provided to allow pedestrians to safely cross Bayshore Boulevard. Overall, it was estimated that at the southbound left-turn, the maximum (95th percentile) queue would be about 70 feet during the weekday PM peak hour, 100 feet during the Saturday midday peak hour, and 85 feet during the weekday peak hour of activity. As such, the left-turn pocket would need to be about 100 feet in length to accommodate the theoretical maximum queues that would develop.

Table C&R.15 Results for Option E – Southbound Left-Turn to Bayshore Driveway			
Time Period	Volume	Average Queue Length	Maximum Queue Length
Weekday PM	95	45	70
Saturday Midday	155	65	100
Weekday Peak Hour of Activity	120	55	85

Source: Wilbur Smith Associates, February 2005

Notes:

Queue length assumes an average of 22 feet per vehicle.

Maximum Queue = 95th percentile queue, theoretical maximum queue used for design of turn pockets.

At the location where the proposed left-turn pocket would be located, the center median on Bayshore Boulevard is currently a fixed solid median (left-turns are not possible). As such, the establishment of the left-turn pocket would not restrict access to any business establishments on the east side of the street.

However, on the west side of the street, there are driveways for the Jack-in-the-Box restaurant at 370 Bayshore Boulevard which are located directly across from the north end of the project site and would be situated in the middle of the new signalized intersection that would be created with the option's main driveway. As such, access to the Jack-in-the-Box driveways would be restricted with Option E, otherwise there would be the potential for conflicts between vehicles entering and exiting the project site and the Jack-in-the-Box. With the proposed plan for Option E, access to the Jack-in-the-Box would be limited to a right-turn in only and a right-turn out only (to and from southbound Bayshore Boulevard). Vehicles destined to and from the Jack-in-the-Box from northbound Bayshore Boulevard would need to make U-turns within the center left-turn median (U-turns can be made to both the north and south of the restaurant site). As a result, Option E would limit access to the Jack-in-the-Box, and additional coordination with the property owners would be necessary.

Parking: Option E would allow for the provision of about 555 parking spaces (including 182 spaces on the ground level, 119 spaces on the second level and 254 spaces on the third level), which would be 16 spaces more than with the proposed project (539 spaces). As such, Option E would provide sufficient spaces to accommodate the maximum weekday and weekend parking demand (502 spaces and 539 spaces, respectively). However, assuming a

90 percent effective capacity of the parking garage (which would correspond to an effective supply of 500 spaces), there would continue to be a parking shortfall during the peak hours of peak days.

Other Queuing/Design Issues: With Option E, two driveways would be provided on Bayshore Boulevard: a right-turn in/right-turn out driveway for northbound traffic at the southern end of the garage, and a partial driveway (with all movements allowed except left-turns from the project site to southbound Bayshore Boulevard) at the northern end of the garage. The southern driveway would be designed so that vehicles would not be able to turn left to or from southbound Bayshore Boulevard. The northern driveway would have over 250 feet of queuing space between Bayshore Boulevard and the garage up/down ramp, which would be sufficient space to accommodate queues that would form at the entrance and exit. As such, it is anticipated that Option E would have a minimal affect to operations on Bayshore Boulevard.

As part of the reconfiguration of the access with Option E, the loading facilities would be relocated to the southern end of the project site. With this location, delivery vehicles would enter the loading area from Waterloo Street and exit onto Loomis Street (as compared to entering from Loomis Street and exiting to northbound Bayshore Boulevard with the proposed project). Delivery vehicles entering the loading area would access Waterloo Street from northbound Bayshore Boulevard, whereas vehicles exiting the loading area would turn left onto northbound Loomis Street to access Oakdale Avenue and Bayshore Boulevard. As such, it would be somewhat more convenient for delivery vehicles to travel between the U.S. 101 on- and off-ramps at Industrial/Alemanay and the project site as compared to with the project.

Option E would also establish a pedestrian crosswalk on the south side of the new intersection at the project driveway. Since the existing intersections of Bayshore/Oakdale and Bayshore/Cortland are about 1,350 feet apart, this new crosswalk would enhance pedestrian circulation in the area. However, with the standard signalization plan for the intersection, southbound traffic would not need to stop. As such, to accommodate pedestrian travel, a separate pedestrian phase would need to be established (with pedestrian actuation), which (when activated) would result in minor delays to southbound traffic. However, since

there would be no left-turn from the project site to southbound Bayshore Boulevard, there would be no conflicts with pedestrian crossings.

Option F

With Option F, a new southbound left-turn would be established from Bayshore Boulevard to the north end of the project site. This left-turn pocket would be within the existing median of Bayshore Boulevard, and would be located mid-block between the intersections of Bayshore/Cortland and Bayshore/Oakdale (about 700 feet north of Cortland Avenue and about 650 feet south of Oakdale Avenue). The new left-turn movement would require the establishment of a new traffic signal on Bayshore Boulevard.

Design of Bayshore Southbound Left-Turn Pocket: Since the new driveway would be located a relatively long distance between the intersections of Bayshore/Cortland and Bayshore/Oakdale (about 700 feet and 650 feet respectively), the new traffic signal would not need to be coordinated with the other signals. However, sufficient pedestrian crossing time would need to be provided to allow pedestrians to safely cross Bayshore Boulevard. Overall, it was estimated that at the southbound left-turn, the maximum (95th percentile) queue would be about 75 feet during the weekday PM peak hour, 125 feet during the Saturday midday peak hour, and 95 feet during the weekday peak hour of activity. As such, the left-turn pocket would need to be about 125 feet in length to accommodate the theoretical maximum queues that would develop.

Table C&R.16 Results for Option F – Southbound Left-Turn to Bayshore Driveway			
Time Period	Volume	Average Queue Length	Maximum Queue Length
Weekday PM	95	50	75
Saturday Midday	155	80	125
Weekday Peak Hour of Activity	120	65	95

Source: Wilbur Smith Associates, February 2005

Notes:

Queue length assumes an average of 22 feet per vehicle.

Maximum Queue = 95th percentile queue, theoretical maximum queue used for design of turn pockets.

At the location where the proposed left-turn pocket would be located, the center median on Bayshore Boulevard is currently a fixed solid median (left-turns are not possible). As such, the establishment of the left-turn pocket would not restrict access to any business establishments on the east side of the street.

However, on the west side of the street, there are driveways for the Jack-in-the-Box restaurant at 370 Bayshore Boulevard which are located directly across from the north end of the project site and would be situated in the middle of the new signalized intersection that would be created with the option's main driveway. As such, access to the Jack-in-the-Box driveways would be restricted with Option F, otherwise there would be the potential for conflicts between vehicles entering and exiting the project site and the Jack-in-the-Box. With the proposed plan for Option F, access to the Jack-in-the-Box would be limited to a right-turn in only and a right-turn out only (to and from southbound Bayshore Boulevard). Vehicles destined to and from the Jack-in-the-Box from northbound Bayshore Boulevard would need to make U-turns within the center left-turn median (U-turns can be made to both the north and south of the restaurant site). As a result, Option F would limit access to the Jack-in-the-Box, and additional coordination with the property owners would be necessary.

Parking: Option F would allow for the provision of about 555 parking spaces (including 182 spaces on the ground level, 119 spaces on the second level and 254 spaces on the third level), which would be about 16 spaces more than with the proposed project (539 spaces). As such, Option F would provide sufficient spaces to accommodate the maximum weekday and weekend parking demand (502 spaces and 539 spaces, respectively). However, assuming a 90 percent effective capacity of the parking garage (which would correspond to an effective supply of 500 spaces), there would continue to be a parking shortfall during the peak hours of peak days.

Other Queuing/Design Issues: With Option F, two driveways would be provided on Bayshore Boulevard: a right-turn in/right-turn out driveway for northbound traffic at the southern end of the garage, and a full driveway (with all movements allowed) at the northern end of the garage. The southern driveway would be designed so that vehicles would not be able to turn left to or from southbound Bayshore Boulevard. The northern driveway would have over 250 feet of storage space between Bayshore Boulevard and the garage up/down

ramp, which would be sufficient storage space to accommodate queues that would form at the entrance and exit. As such, it is anticipated that Option F would have a minimal affect to operations on Bayshore Boulevard.

As part of the reconfiguration of the access with Option F, the loading facilities would be relocated to the southern end of the project site. With this location, delivery vehicles would enter the loading area from Waterloo Street and exit to Loomis Street (as compared to entering from Loomis Street and exiting to northbound Bayshore Boulevard with the proposed project). Delivery vehicles entering the loading area would access Waterloo Street from northbound Bayshore Boulevard, whereas vehicles exiting the loading area would turn left onto northbound Loomis Street to access Oakdale Avenue and Bayshore Boulevard. As such, it would be somewhat more convenient for delivery vehicles to travel between the U.S. 101 on- and off-ramps at Industrial/Alemanay and the project site as compared to with the project.

Option F would also establish a pedestrian crosswalk on the south side of the new intersection at the project driveway. Since the existing intersections of Bayshore/Oakdale and Bayshore/Cortland are about 1,350 feet apart, this new crosswalk would enhance pedestrian circulation in the area. It is anticipated that pedestrians would be able to cross during the westbound signal phase (i.e., when vehicles would exit the project site). However, since vehicles would be able to turn left from the project site to southbound Bayshore Boulevard, there would be the potential for vehicular/pedestrian conflicts at the new crosswalk. To address this issue, it would be necessary to provide an exclusive pedestrian walk phase (with pedestrian actuation). However, when activated, the pedestrian signal would result in increased vehicular delays and the potential for longer queues to develop on Bayshore Boulevard and the project driveways.

CONCLUSIONS

Based on the analyses of intersection operating conditions and the detailed assessments of design, queuing and parking, Option A would have the least potential for new significant impacts or substantial effects to the adjacent transportation network. Options B and C would require signalization of the Industrial/Loomis intersection which may not be feasible, and it

would be complicated to devise a signage plan since the main ingress would be on Loomis Street. Option D would require a new traffic signal about 150 feet north of the intersection of Bayshore/Loomis which may be difficult to coordinate, would have internal vehicular issues, and would result in worse conditions for pedestrians along Bayshore Boulevard. Options E and F would result in limited access to the Jack-in-the-Box restaurant at 370 Bayshore Boulevard. Comparing Options E and F, Option F would allow for improved vehicular access from the project site (since the left-turn to southbound Bayshore Boulevard would be permitted), but would require a pedestrian actuation at the new crosswalk to the south of the Bayshore Boulevard driveway.

Planning Department staffs and the project sponsor have determined that Option F would be the preferred project configuration.

Local Circulation

Comment #75

"Page 42 [of the DEIR:] Please explain the extremely limited access to Bernal Heights, particularly from the east, southeast, and south, including that Cortland is the only street that goes from Mission to Bayshore, that, north of Cortland, the only realistic way off Bernal Hill is 'going over the hill' through narrow residential streets, to access Folsom Street. That access to Alemany and the freeway interchange near this site is down Crescent which, on Saturdays, goes right through the Farmers Market. That, if people on Bernal can't go east to get off the hill, they will have to figure out ways of going west, to Mission Street and/or north to Cesar Chavez to get to any place on the eastern side or northeastern side of the City, or access to the east bay." (*Sue C. Hestor, Attorney at Law, on behalf of Cole Hardware*)

Response #75

Access to Bernal Heights is limited. Cortland Avenue is one of the few east/west streets in the area, and connects Mission Street and Bayshore Boulevard. In addition, Cesar Chavez Street to the north of Bernal Heights and Alemany Boulevard, Crescent Avenue, and Silver Avenue to the south of Bernal Heights are major roadways that serve as primary east/west arterials in the area. In addition, many of the side streets in the area are narrow and have steep grades.

The increase in vehicles on Cortland Avenue as a result of the proposed project would include a portion of the trips from customers in the Glen Park, Diamond Heights, Balboa

Park and outer Noe Valley neighborhoods (which represent 13 percent of the total store activity).

The project would not add a substantial amount of traffic to Cortland Avenue – about 106 vehicles during the weekday PM peak hour and 159 vehicles during the Saturday midday peak hour. While the additional vehicles would result in minor increases in delays along Cortland Avenue, it is not anticipated that this increase would substantially affect overall access through the Bernal Heights area.

Comment #76

"Page 50 [of the DEIR:] Cortland traffic is impeded by current Muni movements. The 24 bus goes up substantial hills on the east and west slopes. Cars get stuck behind the bus when it picks up/drops off passengers. In many instances, it is impossible to pull around the bus, and it may even be dangerous because of obstructed views. As traffic increases and slows down, the buses will also slow down. The traffic calming study is partially intended to slow down traffic to allow pedestrians to safely cross Cortland." (*Sue C. Hestor, Attorney at Law, on behalf of Cole Hardware*)

"Bernal Heights is densely populated and suffers traffic congestion, so much that a Traffic Calming Committee (sponsored, I believe, by [Department of Public Works (DPW)]) has been addressing this problem for a year or more. Cortland Avenue is two narrow lanes, often blocked by trucks, double parkers, etc. This street cannot absorb the estimated 1,200 cars per hour on their way to Home Depot. Drivers will inevitably try to use side streets, but in this case, to no avail. Bernal streets are very narrow and in many cases two cars cannot pass – someone has to back up [or] pull over. There will be total gridlock on Cortland. To make matters worse Home Depot shoppers typically will drive their largest and most polluting vehicles, i.e., SUVs and trucks. Bernal Heights will be suffocated. So much for Traffic Calming." (*Eleanor Vinsant, Resident*)

Response #76

Cortland Avenue is a two-lane roadway, with one travel lane in each direction and on-street parking on both sides of the street. Currently, one Muni bus line operates on Cortland Avenue, the 24-Divisadero, which operates with 8- to 15-minute headways on weekdays and 15- to 20-minute headways on weekends. These headways correspond to four to eight buses per hour on weekdays, and three to four buses per hour on weekends. Although buses stopping along Cortland Avenue temporarily affect traffic flow on the street, they do not substantially affect operations along the street due to the relatively infrequent bus service and generally low traffic volumes. Any interruptions to traffic flow are temporary in nature and do not impact overall roadway operating conditions.

The anticipated increase in traffic associated with the project along Cortland Avenue (about 106 vehicles during the weekday PM peak hour and 159 vehicles during the Saturday midday peak hour) would not substantially worsen operating conditions. At the study intersections of Cortland/Andover and Cortland/Folsom, the project would result in only a minor increase in the average delay per vehicle at the Cortland Avenue approaches. As such, the project would not result in a substantial decrease in travel speeds or a substantial increase in travel times or delays to Muni operations along Cortland Avenue.

See Response to Comment #54 regarding the *South Bernal Heights Traffic Calming Study*.

See Response to Comment #70 regarding pedestrian conditions on Cortland Avenue.

Bayshore Boulevard

Comment #77

"Proposed Redesign of Bayshore Boulevard. The entire roadway section of Bayshore Boulevard between Industrial and Oakdale will be affected by this project. The project does not adequately address the access and operational impacts of the proposed mitigations on Bayshore Boulevard. The installation of a raised median on Bayshore may not be feasible because of property access issues, design problems, and the increased number of U-turns. These issues should be studied by the City, and a final plan should be developed." (*Charles M. Abrams, President, Abrams Associates*)

"Additional discussion and analysis of the project design is warranted. Access to the parking areas, the truck entry, and the traffic on Bayshore, Loomis, Oakdale, and Boutwell contribute to the potential traffic congestion issues. The addition of a U-turn lane on Bayshore will create traffic congestion of vehicles leaving the project garage and crossing traffic to utilize the U-turn and of vehicles that may make the U-turn to head north.

"Improvements to Bayshore do not address access to other Bayshore businesses. The vehicle access to and from the project does not provide access to neighboring businesses. Vehicles will be directed to the project and away from the project. Improvements to Bayshore do not include pedestrian access to neighboring businesses. (*Shelly Bradford Bell, Planning Commission President*)

"Secondly, with respect to Bayshore, if you hate the backups now, particularly when 80 has bad traffic, or when the CHP kills a suspect off the 80, as they did two years ago, and have traffic backed up all the way to 3Com, that makes it impossible to have a big-box store with all of these problems that are associated with the traffic, with respect to the Bayshore corridor traffic at commute times." (*Gil Payne, Resident*)

Response #77

The DEIR evaluated traffic conditions along Bayshore Boulevard between Industrial Street and Oakdale Avenue, including the analysis of the intersections of Bayshore/Industrial, Bayshore/Cortland, and Bayshore/Oakdale. In addition, the inter-sections of Loomis/Oakdale and Loomis/Industrial were evaluated (the effect of project traffic on Boutwell Street was assessed as part of the intersection of Loomis/Industrial, where Boutwell Street is the south leg of the intersection). The additional traffic associated with the project could be accommodated on the roadway network, and no additional mitigation or improvement measures, over and above those changes proposed with the project, would be required. However, as indicated by the commenter, when extreme incidents occur on I-80, congestion may spill back to U.S. 101, which may result in traffic from U.S. 101 diverting to Bayshore Boulevard. The proposed project traffic would also add to traffic congestion when incidents on U.S. 101 affect Bayshore Boulevard operations, but this would not represent a significant traffic impact. The project would establish a southbound left-turn pocket from Bayshore Boulevard to the garage entrance at Bayshore/Cortland. This left-turn pocket would need to be about 180 feet long to accommodate the maximum queues waiting to enter the project site. Since the pocket would be established within the existing center two-way left-turning lane, vehicular access from northbound Bayshore Boulevard to the parking lot on the west side of Bayshore Boulevard for the business at 470 Bayshore Boulevard would be affected. To maintain continual access to this business, a U-turn pocket would be established on Bayshore Boulevard northbound directly north of the southbound left-turn pocket. Since vehicles leaving the project would be able to turn left to southbound Bayshore Boulevard from the main access at Bayshore/Cortland, and a northbound left-turn pocket is already provided at the intersection of Bayshore/Cortland, only vehicles destined to the business at 470 Bayshore Boulevard are anticipated to use the proposed northbound U-turn pocket. The design for the southbound left-turn pocket and the northbound U-turn pocket have not yet been finalized; however, it is anticipated that the two pockets would be separated by a narrow median (a conceptual plan of the turn pockets is illustrated on Figure 12, page 63 of the DEIR), and that the northbound U-turn pocket would be located north of the driveway access to the business at 470 Bayshore Boulevard. The project sponsor would work with the appropriate City agencies (including the Planning Department and DPT) to determine the final design of these changes. Access to other properties along Bayshore Boulevard would not be affected by these proposed changes to Bayshore Boulevard.

The existing left-turn pocket from northbound Bayshore Boulevard to westbound Cortland Avenue that currently allows for U-turns would be retained; however, the pocket would be lengthened to between 210 and 280 feet as part of the proposed project. The project sponsor would work with the appropriate City agencies to determine the final design of these changes.

Comment #78

The project's design does not adequately address the traffic patterns that will result from the project. In paragraph 3 on page 5, additional discussion and analysis is needed relative to the average queues. The proposed left-turn pocket should be analyzed based on peak traffic conditions to the project." *(Shelley Bradford Bell, Planning Commission President)*

Response #78

The queuing analysis is presented in the DEIR on pages 65 through 68 (page 5 contains only a summary of the analysis). At the intersection of Bayshore/Cortland, estimated queue lengths were determined for the weekday PM peak hour, Saturday midday peak hour, and weekday peak hour of trip generation. The design and configuration of the proposed improvements at the intersection were based on the results of this analysis.

At the intersection of Bayshore/Cortland, the new southbound Bayshore Boulevard left-turn pocket would be 180 feet long and would be designed to accommodate the theoretical maximum queue length (95th percentile) that would develop at this location. In addition, the northbound Bayshore Boulevard left-turn pocket would be extended by at least 70 feet (to a length of at least 210 feet) to accommodate the theoretical maximum queue at this location. These queue lengths, and the associated lengths of the left-turn pockets, were based on the traffic volumes anticipated for the weekday PM peak hour, Saturday midday peak hour, and weekday peak hour of activity.

Comment #79

"The project design shows the parking ramps near the Waterloo Street vehicle access. Further analysis is needed to determine if this will contribute to traffic congestion on Waterloo, thus creating traffic problems on Bayshore and/or Cortland Street. The project design will add to the traffic problems by virtue of the layout of the parking garage access and the truck entry off of Waterloo. More analysis should be given to a design that provides better traffic flow to and from the project

area, with improvement conditions made by the project sponsor to prevent traffic jams into the project." (*Shelley Bradford Bell, Planning Commission President*)

Response #79

The primary purpose of the driveway on Waterloo Street is to provide access to the approximately 31 parking spaces on the ground level of the garage that would be located underneath the up/down ramp; however, the driveway would also allow vehicles to access the remainder of the parking garage. The driveway would be located mid-block between Bayshore Boulevard and Loomis Street, about 100 feet east of Bayshore Boulevard. Due to its location and limited visibility, it was estimated that few customers would use this driveway (about 10 during the peak hours). There is only one other business (the Bayshore Builders Supply) that currently has access via Waterloo Street as well as via Loomis Street. As a result, it is anticipated that there would be few issues with congestion on Waterloo Street, and limited potential for queues to spill back onto Bayshore Boulevard.

The project's delivery/unloading area would be located along the northern portion of the project site. The entrance to the loading area would be from Loomis Street, not Waterloo Street, with the exit onto Bayshore Boulevard (right-turn out only).

The project, as analyzed in the DEIR, includes the Loomis Street driveway, which would provide both inbound and outbound access. It is anticipated that this driveway would be used primarily by vehicles traveling to and from Oakdale Avenue, Industrial Street, and Alemany Boulevard/U.S. 101 northbound off-ramp (to Industrial Street).

Freeway Ramps

Comment #80

"Level of Service Degradations for Freeway On-Ramps Unacceptable. The Transportation Study shows that, if the Home Depot is built, in the very near future (year 2015), the five freeway on-ramps will degrade to LOS F. And this cannot be mitigated. The study concludes, '...no feasible mitigation measures to improve operations of the freeway mainline-ramp junction have been identified, and the Proposed project's significant contribution to the on-ramp conditions would be considered a significant unavoidable impact.'¹ We believe that this impact should provide the Planning Commission with an overriding concern about the negative effects of this project on the surrounding

area." (*Eve Bach, Arc Ecology Consultant; Barbara Kyle, Resident/No Depot Committee Chair; and Ron Morgan, Bernal Heights Neighborhood Center Community Organizing Coordinator*)

¹ Transportation Study, page 4-25.

"Traffic safety is at risk, especially freeway off-ramps, a cost Home Depot will not address." (*Jean Fontana, Resident*)

"Freeway on-ramps that are currently graded C will all go to F by 2015. One on-ramp is already at F, so it will worsen too but is already at the worst grade now. This EIR does not take into account the cumulative effect of potentially more large development on this corridor.

"There was no study of the off-ramps in the area and how the increased traffic on the street will affect those. Will this back up onto the freeways themselves?" (*Nic Griffin, Resident*)

"The DEIR recognizes other very significant congestion impacts, particularly that five freeway access ramps will become unacceptably congested. This basically constitutes all of the freeway access ramps from this portion of the City. This means that people in this area will no longer have even relatively uncongested access to the freeways. This seems like a very significant impact as well that is not mentioned." (*Amy D. Kyle, Ph.D., M.P.H., Resident*)

Response #80

As presented in the DEIR on page 61, with the project, the operating conditions of the study freeway on-ramps would not change over existing conditions, and the project would not have a significant impact on freeway on-ramp conditions. It should be noted that under existing conditions, there are frequent queues on the northbound U.S. 101 off-ramp to Bayshore/Cesar Chavez, and queues during the weekday AM peak hour on the northbound I-280 off-ramp to Alemany Boulevard.

By 2015, however, it was determined that the five analysis freeway on-ramps would operate at LOS F during the weekday PM peak hour (one of which already operates at LOS F under existing conditions), as noted on page 77 of the DEIR. In addition, two of the on-ramps would operate at LOS F during the Saturday midday peak hour (one of which already operates at LOS F under existing conditions).

In general, the operations of freeway on-ramps are dictated by the mainline freeway volumes, not the on-ramp volumes. As such, the poor operating 2015 Cumulative operating conditions would primarily be a result of the anticipated increase in traffic volumes on U.S. 101 and I-280. The increase in traffic volumes along the on-ramps and the freeway mainlines takes

into account the anticipated growth in traffic throughout the study area, including the proposed project.

It was determined that the project would have a significant contribution to the poor operating conditions at all study freeway on-ramps that would operate at LOS F under 2015 Cumulative conditions since the project would contribute more than five percent to the increase in freeway on-ramp volumes at each location (project contribution to growth in volumes between existing and 2015 Cumulative conditions would range from 15 to 59 percent). However, since the operating conditions are primarily dictated by the freeway mainline traffic volumes, additional freeway mainline capacity would be needed on U.S. 101 and I-280 to alleviate the poor operating conditions. As a result, the project's significant contribution to the on-ramp conditions would be considered a significant unavoidable impact.

In general, the operations of freeway off-ramps are dictated by the operations of adjacent and/or controlling intersections. As such, the operations of these off-ramps were included in the analysis of the adjacent study intersections. Most of these intersections were included as study intersections in the DEIR, and no project-related significant impacts were identified. For the off-ramps that are not located adjacent to study intersections, a qualitative assessment of off-ramp operations was conducted based on field observations of mainline and off-ramp conditions during the analysis periods. In general, these locations were observed to be operating with acceptable conditions during the weekday PM peak hour and the Saturday midday peak hour, with relatively short queues that did not extend back to the freeway mainline.

Based on the origin/destination of the trips generated by the project, it was estimated that the project would add about 270 vehicles to northbound/southbound U.S. 101 and eastbound/westbound I-280 during the weekday PM peak hour, and 400 vehicles during the Saturday midday peak hour. These additional project-related vehicles would be distributed among the on-ramps and off-ramps serving the project site, and would not result in a substantial increase in off-ramp traffic volumes. As a result, the proposed project would not likely have a significant impact on traffic operations and safety conditions on the freeway ramps.

Comment #81

"The freeway exits are too small and will clog the freeway more than the report suggests, particularly northbound 101 and southbound 280." (*Amy C. Miller and Virginia Bowen, Residents*)

Response #81

All off-ramps for U.S. 101 and I-280 in the vicinity of the project site were designed to meet the Caltrans standards at the time of construction.

Vehicle-trips coming to the project site via the regional highway network would primarily be on U.S. 101 northbound (and use the Alemany/Industrial off-ramp) or I-280 northbound (and use the Alemany off-ramp). The project would contribute 34 and 55 vehicles during the weekday PM and Saturday midday peak hours, respectively, to the I-280 northbound off-ramp at Alemany, and 66 and 106 vehicles during the weekday PM and Saturday midday peak hours, respectively, to the U.S. 101 off-ramp at Alemany/Industrial. The intersection of Alemany/Industrial controls the operations of the ramp, and this intersection would continue to operate at acceptable levels (LOS D or better) during both the weekday PM and Saturday midday peak hours. Field observations have indicated that the I-280 northbound ramp currently has sufficient storage capacity to accommodate the additional 34 to 55 vehicles per hour. In addition, the downstream intersection of Alemany/Putman/U.S. 101 southbound off-ramp is projected to operate at acceptable levels of LOS D or better with and without the proposed project. It is not anticipated that many project trips would use I-280 southbound north of the project site, and instead customers from the northeast portion of San Francisco would likely use local streets to access the project site.

Comment #82

"My comments on the EIR are concerning the environmental impact on Bayshore Boulevard and entering the freeway, and the impact that – the differential of the impact of when the Fell Street off-ramp was up, and since it has been torn down. Because we had a consistent increase in traffic in trying to get on that freeway since that Fell Street off-ramp has been pulled down. Traffic is backing up now. So the EIR might have been good before Caltrans tore down that part of the freeway, but it has been backed up since, and a lot of people are taking off, coming off on Bayshore, and taking other routes out. So these people are talking about there ain't going to be a big increase in traffic: Try to go down there now, and get out of here and go across the bay, and you will see what you are likely to contend with. Have the EPA check the pollution on all cars backed up. So I'm concerned what the impact is now with all the automobiles since that freeway has been torn down. And traffic is considerably backed up. You have a heck of a time getting on the freeway, or if you want to take Potrero." (*Al Norman, Resident*)

Response #82

The Fell Street off-ramp (plus the old Oak Street on-ramp) to/from U.S. 101 is currently being replaced by Caltrans with a new on- and off-ramp to Market Street and the new Octavia Boulevard. The purpose of the Caltrans project is to restore the previous service provided by the Fell Street and Oak Street ramps to north of Market Street by a surface route providing an equivalent amount of traffic-carrying capacity as the previous Oak Street and Fell Street ramps. Construction of the replacement ramp and Octavia Boulevard has begun, and will be completed by early 2006 according to the City of San Francisco and Caltrans. The proposed Home Depot store is scheduled to open in late 2006, about the same time the new ramps and Octavia Boulevard will be operational. Any increase in current traffic volumes on Bayshore Boulevard and U.S. 101 in the vicinity of the project site that followed the demolition of the Fell Street off-ramp would likely be reduced when the new replacement facility is operational.

Comment #83

"The other example that I would like to share is the condition of getting off the freeway in Emeryville, outside IKEA. I don't have the figures on that, but I think probably comparable with what you have proposed here, and it strikes me that we would be facing a similar condition on freeways surrounding this proposed Home Depot project. And consequently it would have a very significant traffic impact. So basically I intuitively feel it probably underestimates the impact, so I would urge you to look for greater study of that." (*Brent Daniel, Resident*)

Response #83

A comparison of the impacts of the IKEA store in Emeryville to the anticipated impacts associated with the proposed project is not appropriate. The proposed Home Depot store and the existing IKEA store have different trip generation characteristics since they sell different products and have different customer profiles and trip purposes; are different in size (the IKEA store in Emeryville is about 275,000 sq.ft.)²⁹; are in areas with different intensities of retail, commercial and residential development; and have different access configurations from the freeway and at local intersections. Traffic congestion associated with access to the IKEA store is largely related to the constraints at the I-80 freeway connections at Powell

²⁹ Diana L Keena, AICP, Associate Planner, City of Emeryville, e-mail to Audrey Pearson, City Attorney San Francisco, May 19, 2005. This e-mail is on file and available for public review by appointment at the San Francisco Planning Department, 1660 Mission Street, Fifth Floor, San Francisco, as part of Case File 2001.0062E.

Street, and is due to large volumes of IKEA and non-IKEA traffic demand competing for limited roadway capacity. In addition to the IKEA store, the freeway connections serve vehicles generated by three retail complexes, two movie theaters, large residential and office developments, as well as a hotel.

Comment #84

"I have really appreciated hearing everyone's comments today, and I am also concerned about overflow traffic; traffic on Cortland; all of those issues. The one thing I wanted to add that I haven't heard discussed today is people talk about that this could be a good placement for a Home Depot because multiple, multiple merges right as you are going past that area, so that when you go – like 280 and 101 come together right in that area, so if you are driving south on 280 and want to go to Bernal Heights, like I often want to do, you have to merge over by four or five or six lanes, as different highways and freeways come together. That already makes a lot of traffic impact right there. And I think that adding additional traffic – this is not even to mention Bernal Heights, but just the freeway approaches to that area – I think is going to create a lot of extra danger and backup because of all that merging." (*Phoebe Grigg, Resident*)

"Both sponsors and project advocates in favor, and those that spoke in opposition, discussed access with respect to Cortland, and the impact that would have; whether or not many people came via Cortland or didn't certainly – it is certain to assume that people will come off the freeway. I think in order for it to be adequate, it should address access that is southbound from 280. One of the earlier speakers mentioned that you have to cross a number of traffic lanes, once you get off the 280 southbound exit. I believe that to be accurate. It should speak to that. It should also speak to the vehicle types. There are many industrial uses in that area; a lot of trucks in that area. And when it does vehicle counts, it should address the fact that in that particular area we do have a number of heavy vehicles, and the impact that may or may not have on this project." (*Kevin Hughes, Planning Commissioner*)

Response #84

The proposed project would be located near on- and off-ramps to two regional freeways – U.S. 101 and I-280. As a result, there would be regional access to and from the project site. As indicated by the commenters, U.S. 101 and I-280 merge south of the project site. The merges of I-280 and U.S. 101, and the close spacing of merges and the on- and off-ramps, result in the need for drivers to change multiple lanes whether continuing on I-280 or U.S. 101, or accessing a ramp. These lane changes (weaving movements) often result in breakdown of freeway operations during peak periods.

Based on the origin/destination of the trips generated by the project, it was estimated that the project would add about 270 vehicles to U.S. 101 and I-280 during the weekday PM peak hour, and 400 vehicles during the Saturday midday peak hour. The trips generated by the

proposed project would somewhat increase the level of weaving that occurs by vehicles destined to the off-ramps serving the project, as well as vehicles accessing the freeway from the on-ramps. Overall, these additional project-related vehicles would not result in a substantial increase in freeway traffic volumes and weaving movements and would not substantially affect freeway operations. As a result, the proposed project would not be considered to have a significant impact on freeway operating conditions.

The closest southbound I-280 off-ramps to the project site are located at Pennsylvania Street and at Alemany Boulevard. To access the project site from the Pennsylvania off-ramp, vehicles would have to travel south on Pennsylvania Street, turn right onto Cesar Chavez Street, turn left onto Evans Avenue, turn right onto Toland Street and turn right onto Oakdale Avenue. Since the Alemany Boulevard exit is located west of the U.S. 101 merge, vehicles are required to travel across several lanes of traffic to exit at the Alemany off-ramp. To access the project site from the Alemany off-ramp, vehicles would have to turn right onto Ellsworth Street and continue north until Cortland Avenue, or turn right onto Crescent Avenue, turn left onto Putnam Street and continue north until Cortland Avenue.

Based on the location of the project site and the likely origin/destination of the trips, it was estimated that few vehicles would access the site from southbound I-280. For a more direct route, vehicles from the northeast portion of San Francisco would likely use U.S. 101 southbound, Potrero Avenue or Third Street to travel to and from the project site.

Currently, the major streets in the vicinity of the project (including Bayshore Boulevard and Alemany Boulevard/Industrial Street) have a relatively high percentage of truck traffic, about 5 to 10 percent during the peak hours based on field observations conducted for this analysis. The percentage of heavy vehicles currently on the roadway network was included in the analysis of the intersection operating conditions.

PEDESTRIANS

Comment #85

"As a legally blind resident of Bernal Heights, I walk down into the old plant house, owned and operated for a long, long time, and I can tell that you walking across the street and going down Cortland and crossing the street to Bayshore is really, really tough – compounded with this proposed site of Home Depot is going to get a lot tougher. Almost everyone will get the monstrosity what with the approved target in traffic. For me it is going to be totally, totally almost impossible for me to enjoy my life there. Previously I talked to you about working South of Market; I told you about the space for the airport screener program there. I take the 299 from Bernal down to Bayshore to the airport, and in the morning with the previous people I have talked about the high traffic densities and so on. And it takes me two hours to get back from the airport on the 299, coming through Bayshore, to be dropped off and walk up the hill to Cortland. So I think everybody needs to put into consideration about the effects of the people who actually live there and work there, and also what they're going through, basically, in my situation – and there's also other situations here."(*Roy Recio, Resident*)

Response #85

The Planning Department's significance criteria for pedestrians is that a project would have a significant effect on the environment if it were to result in substantial over-crowding on public sidewalks, create potentially hazardous conditions for pedestrians, or otherwise interfere with pedestrian accessibility to the site and adjoining areas. Based on the results of the intersection operations analysis conducted for the DEIR, the project would result in a minor increase in average vehicular delay (less than two seconds per vehicle) at the study intersections of Cortland/Andover and Cortland/Folsom, for traffic on Cortland Avenue and the side streets. As a result of the minimal increase in vehicular delays associated with the increase in vehicles, it is anticipated that the project would not result in increased delays and danger to pedestrians on Cortland Avenue. The addition of traffic on Cortland Avenue and resulting increase in delays at the intersections would not result in an increase in travel speeds on Cortland Avenue or the side streets. At the intersection of Bayshore/Cortland, the amount of green time available for pedestrians to cross Bayshore Boulevard would increase with the proposed project from 20 seconds to 25 seconds. As such, the project would not be considered to have a significant impact to pedestrians. Also refer to Response to Comment #70 regarding improvements planned for implementation by DPT, as part of the *South Bernal Heights Traffic Calming Study*, that would enhance pedestrian conditions and safety along Cortland Avenue.

Comment #86

"Page 56 [of the DEIR:] Pedestrians - [I]t is apparent that the auto-dominant nature of this project, in conjunction with project and general pedestrian traffic will result in hazardous conditions for pedestrians, particularly since the main entrance of the garage is at Cortland and Bayshore where pedestrian activity will peak. Cars scrambling to 'get through on the light' are particularly notorious for ignoring pedestrians. Also, will there be glare problems for cars exiting, where cars leaving a garage may have problems seeing pedestrians, or where cars entering a dim garage may have problems seeing pedestrians in the garage.

"Factoring in people walking from buses toward Home Depot and other stores in the area, making transfers between bus lines, and walking from curb parking, please show on a map pedestrian flows in this area, including the traffic lanes and level of traffic in those lanes. This should include all entry/exit points to Home Depot since pedestrians will be walking in front of those points. Please factor in Home Depot employees." (*Sue C. Hestor, Attorney at Law, on behalf of Cole Hardware*)

Response #86

It is anticipated that most customers of the project would drive to and from the project site, and that the project would not result in a substantial increase in pedestrian activity along Bayshore Boulevard and Cortland Avenue. As indicated on DEIR page 53, on typical weekdays and weekends, pedestrian activity in the immediate vicinity of the project site is relatively light throughout the day. Currently, most of the pedestrians at this location are walking to and from the nearby Muni and SamTrans bus stops.

Recently, improvements to pedestrian facilities at the intersection of Bayshore/Cortland have been implemented, including the installation of new pedestrian signals with count-down indicators (WALK/DON'T WALK indicators which present the time remaining to cross the street) for eastbound/westbound pedestrians. With the project, the amount of green time available for pedestrians to cross Bayshore Boulevard would be increased. In addition, DPT has conducted an initial assessment of the appropriateness of installing new sidewalk bulb-outs at the corners of the intersection of Bayshore/Cortland, and has determined that a bulb-out would not be feasible at the northwest corner and that additional study would be required to determine the appropriateness of bulb-outs at the northeast, southwest and southeast corners.³⁰ Although the project would result in an increase in pedestrian/vehicular conflicts at the intersection of Bayshore/Cortland (primarily due to the increased volume of vehicles turning right or left from Bayshore Boulevard or Cortland Avenue), the intersection

³⁰ Letter from Bond Yee, Director of the Department of Parking and Traffic to Tim Erney, Wilbur Smith Associates, September 7, 2004, op cit.

improvements would enhance pedestrian safety. It should be noted that with the project there would be an increase in vehicles crossing the north and south crosswalks, which would increase the potential for conflicts between vehicles and pedestrians.

The pedestrian access plan for the project is described in Response to Comment #5 and presented in Figure C&R.6 on page C&R.27.

Building codes and standards address issues such as appropriate interior and exterior lighting and prevention of glare. The parking garage would be designed using these industry standards and code requirements for visibility and sight distances for vehicles entering and exiting the garage (all plans for the garage and building design will need to be reviewed and approved by the City). In addition, the revised traffic signal at the intersection of Bayshore/Cortland would include backplates that block the sun and other possible distractions from the area around the traffic signals. At the intersection of Bayshore/Cortland, it is likely that Bernal Hill and U.S. 101 west of Bayshore Boulevard would shade the intersection from the setting sun. While there may be instances when drivers experience glare, this condition is not anticipated to cause hazardous conditions for pedestrians by vehicles entering or exiting the garage.

Comment #87

"Page 54 indicates the traffic signal at Cortland and Bayshore is 20-25 seconds, often meaning people are unable to cross within the allotted time. Additional discussion and analysis of improvement should be given to improving the allotted crossing time considering people leaving the proposed project may be carrying purchases. If time for this signal is increased, then impacts on traffic queued to turn will increase. This warrants further discussion on parking lot access in the project design and any potential improvement conditions the project sponsor will need to address." *(Shelley Bradford Bell, Planning Commissioner)*

"The DEIR does not appear to be familiar with the traffic pattern at the intersection of Cortland and Bayshore. Access to Bayshore to the Home Depot site or to the 101 on-ramp requires a left turn from Cortland to Bayshore. This left turn capacity is already highly utilized. This requires crossing through the pedestrian crosswalks across Bayshore. The DEIR does not recognize the significance of the conflicts between automotive and pedestrian needs at this corner. The crossing time to get all the way across Bayshore is considerable. When pedestrians are crossing, the time available for a left turn is reduced to half or less of what it would be otherwise. This can only be expected to increase if a huge Home Depot is built here. Moreover, the DEIR notes that the existing, narrow median would be removed from Bayshore, leaving pedestrians wholly at the mercy of hurried drivers who already have had to wait a long time to turn left. This corner has already been identified as a dangerous

intersection for pedestrians. The DEIR does not even recognize that these conflicts will become vastly worse and will increase congestion over what is projected." (*Amy D. Kyle, Ph.D., M.P.H., Resident*)

Response #87

It is anticipated that most customers of the project would drive to and from the project, and that the project would not result in a substantial increase in pedestrian activity along Bayshore Boulevard and Cortland Avenue. Currently, most of the pedestrians at this location are walking to and from the nearby Muni and SamTrans bus stops.

Vehicles destined to or from the project site traveling to and from the Bayshore/Cortland driveway on Cortland Avenue would not cross the east/west crosswalks at the Bayshore Boulevard intersection, because they would drive straight through the intersection. However, vehicles exiting the Bayshore/Cortland driveway and making right or left turns onto Bayshore Boulevard would have the same signal phase as pedestrians crossing Bayshore Boulevard, which may result in an increase in conflicts between pedestrians and vehicles. The most recent traffic collision history report for this intersection, as obtained from DPT, was for the five-year period between March 1998 and March 2003. For these five years, there were a total of 11 collisions, of which three involved pedestrians.

As stated on page 71 of the DEIR, pedestrians currently have 20 to 25 seconds to cross Bayshore Boulevard at Cortland Avenue during a normal intersection signal phase, and 30 seconds when the pedestrian crossing phase is actuated (i.e., when the pedestrian button is pushed). DPT designs signal timing plans for intersections so that pedestrians have adequate time to safely cross the street. When the pedestrian phase is actuated, there is sufficient time for most pedestrians to cross. Based on field observations conducted for the DEIR, the primary reason that some pedestrians were not able to cross the street within the allotted time was observed to be that they left late into the cycle (i.e., when the red hand was flashing), were jaywalking, or did not activate the pedestrian crossing phase. It should be noted that new pedestrian signals with countdown indicators were recently installed at the intersection of Bayshore/Cortland for eastbound/westbound pedestrians, which serve to improve pedestrian crossings and reduce the potential for pedestrians to not entirely clear the street.

In addition, the new signal plan for the intersection of Bayshore/Cortland that would be instituted with the project would provide sufficient green time for pedestrians crossing Bayshore Boulevard. Since pedestrians would be able to cross Bayshore Boulevard during both the eastbound and westbound signal phases, the amount of crossing time would substantially increase (up to 43 seconds during the weekday PM peak hour and 61 seconds during the Saturday midday peak hour). The new pedestrian signals with countdown indicators that were recently installed help allow pedestrians to safely cross Bayshore Boulevard. With the proposed project, these pedestrian countdown indicators would also facilitate crossing Bayshore Boulevard, even with the removal of the existing pedestrian island on the north side of the intersection. The pedestrian island on the south side of the intersection would remain with the project. It should be noted that with the project there would be an increase in vehicles crossing the north and south crosswalks, which would increase the potential for conflicts between vehicles and pedestrians. However, based on the improvements to the signal (count down indicators), this would not create a potentially hazardous condition or result in a significant impact. The increased green time provided with the new signal was incorporated into the intersection analysis for both Existing plus Project and 2015 Cumulative scenarios and therefore the intersection operations presented for Bayshore/Cortland in the DEIR represent the anticipated conditions.

Comment #88

"I would like to address several issues that will affect traffic and customer safety. Our customers who park in our corner lot at the intersection of Bayshore and Cortland need to be able to safely exit the lot when making a left turn onto Cortland heading east. Presently, there are not long lines of traffic, and cars are let into the lane without any resulting problems.

"With the increase of traffic heading eastbound, and drivers attempting to run the light because of impatience, there will be a real safety issue for someone trying to turn left out of our lot. It is not logical to put a 'No Left Turn' sign out of our lot because there is no existing turnaround area, as Cortland is a narrow street. A possible remedy would be a 'Keep Clear' area for cars to remain behind when drivers are moving east on Cortland.

"Another issue will be traffic going southbound on Bayshore that is turning right onto Cortland. There is a potential safety problem for cars coming out of our lot. Traffic turning right onto Cortland from Bayshore presently swing right very quickly and frequently don't stop for red lights on Bayshore. With the increase of traffic on Bayshore, there would be further safety concerns. A partial remedy would be to install a 'No Right Turn on Red' at Bayshore or a signal in our lot letting the people out and stopping traffic southbound on Bayshore, east and westbound on Cortland. This traffic light could be sensory operated, so it only activated when a driver pulled out." (*Philip Lerner, Floorcraft/Carpet One*)

Response #88

The project sponsor has committed to working with DPT and the owners of Floorcraft regarding potential improvements at the intersection of Bayshore/Cortland. For instance, the project sponsor has agreed to contribute funding to establish a KEEP CLEAR zone on eastbound Cortland Avenue, directly across from the Floorcraft parking lot, if this improvement is recommended by DPT based on observations of intersection operations following the opening of the proposed Home Depot store. The KEEP CLEAR zone would allow vehicles exiting the Floorcraft parking lot to turn left onto eastbound Cortland Avenue without having to wait for a gap in the traffic queue. If this measure were implemented, the length of the queue along eastbound Cortland Avenue (from Bayshore Boulevard) would increase by the length of the KEEP CLEAR zone, or about 20 to 30 feet (note that the number of vehicles in the queue would not change). However, this lengthening of the queue would not substantially affect the results of the queuing analysis presented in the DEIR on pages 65 through 68.

The project would not add noticeable traffic to the right-turn movement from southbound Bayshore Boulevard to Cortland Avenue or to the southbound through movement. Therefore, the project would not affect conditions for these movements. The placement of a "No Turn on Red" restriction for the southbound right-turn from Bayshore Boulevard to westbound Cortland Avenue and signalization of the Floorcraft parking lot, as suggested by the commenter, was reviewed by DPT and determined not to be feasible.³¹

Comment #89

"Another issue I would like to address is the cross pedestrian traffic issue. When Goodman's was in business, many customers would park in our corner parking lot or frontage parking lot and jaywalk across the street because it was faster and easier than parking in Goodman's lot. It worked both ways on busy days. With the advent of Home Depot, this situation would be far worse because the traffic would be many times greater. It is a vital safety concern because of the constant pedestrian jaywalking.

"In addition, many customers do not like parking on second or third floor levels, and may think it more convenient to use our lot for parking instead, and then run across the street. A possible remedy would be to construct a barrier on Bayshore down the center, perhaps a fence, and create a turnaround lane north of our building to ensure that people did not dart through the U-turn area.

³¹ Ibid.

"A possible solution to Home Depot's customer usage of our corner lot would be make it as inconvenient as possible to park there by having Home Depot's customer store entrance and exit as far back towards Loomis Street as possible, thereby establishing the need to use their parking lot for convenience. I'm assuming that is the only entrance to the store, as I believe more chaos would arise if an entrance were placed on the Bayshore side of the store." (*Philip Lerner, Floorcraft/Carpet One*)

Response #89

The project's parking garage would provide 539 parking spaces, which would accommodate its expected parking demand of 502 parking spaces on a weekday and 539 parking spaces on a Saturday. It should be noted that the analysis contained in the Transportation Study and the DEIR assumed a parking supply of 550 spaces. Refer to Response to Comment #6 and Section E – Staff-Initiated Text Changes and Errata, specifically pages C&R.358, C&R.360, and C&R.362 to C&R. 364, which include changes to the project and EIR text changes. In addition, the second level of the parking garage would have connection to the mezzanine level of the store and a secondary pick-up location would be provided. These amenities would enhance the attractiveness of parking in the upper levels of the parking garage. Therefore, it is anticipated that there would be minimal spillover to on-street parking or to the Floorcraft parking lot. The primary pedestrian entrance/exit for the project would be located away from the Bayshore Boulevard street frontage (but could be accessed from Bayshore Boulevard), and would be within the parking structure between Bayshore Boulevard and Loomis Street. This location of the pedestrian entrance/exit would encourage visitors to the proposed project to park within the project parking facility and would reduce the attractiveness of parking further away from the project site (either on-street or within the Floorcraft parking lot). It should be noted that Home Depot customers that park in the project parking garage may also visit other nearby establishments such as Floorcraft, or Floorcraft patrons may also find it more convenient to park at the Home Depot parking garage rather than searching for on-street parking.

The project includes improvements to the intersection of Bayshore/Cortland, including a new southbound left turn pocket, the extension of the northbound left turn pocket, and provision of pedestrian countdown signals for northbound/southbound pedestrians. In addition, pedestrian countdown signals have been recently installed for eastbound/westbound pedestrians. It is not anticipated that customers of the project would not utilize the signalized crosswalk at the intersection of Bayshore/Cortland and would cross Bayshore Boulevard

mid-block to access the Floorcraft parking lots, or that customers of Floorcraft would cross Bayshore Boulevard midblock to access the proposed project's parking facility. As such, measures such as barriers or fences, or turnaround lanes, are not warranted and were not considered in the DEIR. See Response to Comment #87 for discussion of additional pedestrian improvements at the intersection of Bayshore/Cortland.

BICYCLES

Comment #90

"I know that I have spoken with President Bell about some of the things that need to be addressed, and she'll have some other comments, I'm sure, but the points about bike lanes and things that need to be done on Bayshore Boulevard I think are very important, because, you probably are only going to have one shot to do it, and at least if you are going to do it, let's do it the right way, and make it pedestrian friendly, as well as mitigate the traffic problems that will be presented." (*Michael Antonini, Planning Commissioner*)

"And I have something else to say: Bayshore is a cutout. If you are on a bicycle, and you want to get from San Bruno Avenue, for example, where I went recently on my bicycle, just to see what was happening down south. Because usually I'm headed toward San Francisco; I don't go down south; I'm going towards in San Francisco. But when I went down to San Bruno recently I noticed there were bike lanes there. And I was saying, 'How the heck would someone get from San Bruno – where I have a friend who lives down there, and I was trying to purchase the right bike – How do you get from San Bruno to downtown San Francisco to commute?' And I'm asking you to plan for the future. This is the time to plan for the future; not at some future time when you think, 'Well, maybe if the problem gets bad enough we can start planning for it.' The time to plan for it is now, and there is no way that – going up Cortland or going up to Bernal Heights it is a grueling hill on a bicycle, and every provision should be made for allowing bicycle riding through an area that is a cutout between the hills – which is what Bayshore is. And I don't see any planning about that in the environmental impact report; I think it is very important for the people from San Bruno Avenue." (*John Daniel, Resident*)

"I come from just west of Bernal Heights in my job that I have been working for three years – which is a block off of Bayshore on Jerrold Avenue. On Monday night I saw a cyclist get hit by a car on Oakdale at Bayshore, so it is already happening. I didn't speak to the fact that I get spit at and yelled at and having things thrown at me by people coming off of Cortland, turning on to Bayshore. So when I see these other people, who are going to be impatient – 1,200 more cars per hour as I'm coming from my job – what are they going to do? Are they going to run me off the road?" (*Rachel Kesel, Resident*)

"The San Francisco Bicycle Coalition would like to submit the following comments regarding the proposed Home Depot development at 491 Bayshore Boulevard on behalf of our 4,200 dues paying members. We feel that this EIR does not adequately portray the potential negative environmental

effects of the development, including but not limited to its effects on bicyclists and pedestrians, air quality, and traffic congestion.

"Bayshore Boulevard is a critical north-south bicycle route through the Bayview and Bernal Heights neighborhood. Current conditions are unacceptable for bicycles, given the already heavy traffic and speed differential that exists, together with a lack of dedicated bicycle lanes. The Home Depot will result in a significant increase in traffic to the site, including large delivery trucks, particularly hazardous to cyclists in areas lacking adequate bicycle facilities. This development will directly increase potential danger and conflict between bicyclists and motor vehicles. In fact, the EIR acknowledges that the Home Depot project will result in 'increased potential for conflicts between motorists and bicyclists, as there would be more competition for the travel lanes between bicycles, autos, and trucks.' It goes on to say that 'this would not, however, adversely impact bicycle conditions.' Bicycle conditions are clearly 'adversely impacted' when there is additional motor traffic, especially on a road such as Bayshore without bike lanes. This is a very real impact that is not related accurately in this EIR.

"As a result, we believe it is proper (and not without precedent in other cities) to require Home Depot to provide mitigation measures that will address the serious impacts on bicycle traffic along Bayshore, commensurate with the impacts of the development. Just as pedestrian impacts are being mitigated by providing countdown signals and bulb outs, Home Depot should be required to pay for the installation of bicycle lanes along Bayshore. The City should not be left with the tab for providing basic transportation facilities that have become chronically needed as a result of a private development project. In fact, Bayshore Boulevard has already been identified in the San Francisco Bike Plan Update as one of the City's 'top 20' needed bicycle projects. It is highly likely, given the arterial nature of Bayshore Boulevard, that bike lanes will be the preferred alternative." (*Leah Shahum, Executive Director of the San Francisco Bicycle Coalition*)

Response #90

An update to the *San Francisco Bicycle Plan 2004* (Bicycle Plan 2004)³² has recently been approved by the San Francisco Planning Commission and is currently being considered by the Board of Supervisors for incorporation into the San Francisco *General Plan*. The City of San Francisco is also considering adopting the *San Francisco Bicycle Plan Update*³³ (Update), which would include both a new bicycle network map and 18 short-term projects. This Update, however, is currently not intended to be incorporated into the *General Plan*.³⁴ The Bicycle Plan 2004 and the Update have not yet been adopted by the City of San Francisco and, therefore, do not have regulatory authority. For informational purposes, this response will discuss how these proposed policies relate to the project.

³² City and County of San Francisco, *San Francisco Bicycle Plan 2004*, September 2004. This report is available for public review online at: http://www.sfgov.org/site/bac_index.asp?id=11525.

³³ City and County of San Francisco, Department of Parking and Traffic, "San Francisco Bicycle Plan Update Preliminary Engineering Priority Project Sheets – Bayshore Boulevard," December 2003.

³⁴ Personal communication with Josh Switzky, San Francisco Planning Department, April 19, 2005.

Bicycle Plan 2004 includes recommended changes and improvements to the existing Bicycle Route Network (Network). The relevant proposed route changes to the Network include additions of certain streets in the project area to the Network. These additions are: 1) Industrial Street between Oakdale Avenue and Bayshore Boulevard and 2) Loomis Street between Industrial Street and Oakdale Avenue. These recommended changes do not specify any physical improvements or modifications to Industrial or Loomis Streets; therefore, this new designation, if incorporated into the *General Plan*, would not conflict with the project. Also, the project would not interfere with the proposed designation of proposed bicycle routes on Loomis and Industrial streets. Therefore, the proposed project would not change or conflict with proposed recommended changes in Bicycle Plan 2004.

The extension of the bicycle network on Loomis Street and Industrial Street could result in more bicyclists using Loomis Street. The increase in the number of bicyclists on this segment, coupled with the increase in vehicles associated with the proposed project, could result in an increase in conflicts between autos and bicyclists. However, this condition would not be dissimilar to operations on other San Francisco streets designated as bicycle routes where vehicles and bicyclists share the travel lane.

Bayshore Boulevard is classified as a "Major Arterial" in the *San Francisco General Plan*, which is defined as cross-town thoroughfares whose primary function is to link districts within the city and distribute traffic to and from the freeways, and are generally of citywide significance. Bicycle route #25 runs along Bayshore Boulevard as a signed route only (signed routes with no designated bike lane are classified as Class III facilities). The project and associated intersection improvements would not preclude the establishment of bicycle lanes on Bayshore Boulevard, and project improvements at the intersection of Bayshore/Cortland would be designed to incorporate any planned bicycle improvements along Bayshore Boulevard.

The Update includes 18 specific short-term projects, including improvements to Bayshore Boulevard. For the section of Bayshore Boulevard in the vicinity of the project site, it was recommended that a bicycle lane be provided in the northbound direction either by eliminating one northbound travel lane (Option 1) or by narrowing the existing median and travel lanes (Option 2), both of which would allow the provision of a 6-foot-wide bicycle

lane. Option 2 would not be inconsistent with the improvements proposed as part of the project and would be incorporated into the proposed project's redesign of the intersection of Bayshore/Cortland (although the project would propose to convert a portion of the existing median into a dedicated southbound left-turn lane, it would not result in narrowing the width of the median). The analysis of intersection operating conditions with this option would be the same as those presented in the DEIR, as capacity on Bayshore Boulevard would be maintained. However, since Option 1 would result in a decrease in capacity on northbound Bayshore Boulevard, operating conditions at the study intersections would likely worsen under the analysis scenarios. The provision of a northbound bicycle lane under either option and increased bicycle travel on northbound Bayshore Boulevard would result in an increase in potential for conflicts between bicycles and northbound project traffic turning right at the intersection of Bayshore/Cortland. The project sponsor has agreed to stripe a bicycle lane along the east side of Bayshore Boulevard in front of the project area. While the exact design must be established by City transportation planners, a striped bicycle lane is expected to reduce potential conflicts by not requiring bicyclists to share the travel lane with vehicles, which would also enhance the visibility of bicyclists to drivers.

It was estimated that the project would generate about 848 vehicle-trips during the weekday PM peak hour and 1,268 vehicle-trips during the Saturday midday peak hour. Since the project site has multiple access points, these trips would be distributed between Loomis Street (to Oakdale Avenue and Industrial Street) and Bayshore Boulevard. The project would result in an increase in traffic levels on Bayshore Boulevard, especially for the segment between Oakdale Avenue and Industrial Street.

Currently, during the weekday PM peak hour, Bayshore Boulevard carries over 2,600 vehicles between Oakdale Avenue and Industrial Street. The project would add about 200 to 400 vehicles to Bayshore Boulevard during the weekday PM peak hour, which would represent an increase of 7 to 15 percent.

The DEIR on page 72 concluded that while the number of vehicles on Bayshore Boulevard and the potential for conflicts between bicyclists and vehicles would increase with the project (in particular the northbound right-turn movement into the project's Bayshore/Cortland driveway), the project would not substantially affect bicycle conditions on Bayshore

Boulevard. This is true because the project itself would not cause any major changes to bicycle routing, signing, or flow, except for the proposed additional of a bicycle lane, which would be a beneficial addition. The main Bayshore Boulevard driveway to the proposed project would be located directly at the Cortland Avenue intersection, where there is a traffic light. This traffic light would provide for a signalized driveway, which would control both motorized and bicycle traffic, thereby eliminating most potential conflicts. In addition, traffic merging onto Bayshore Boulevard from the proposed project parking lot would not be permitted to block bicycle lanes, per California Vehicle Code Section 21211(a). As a result, no additional mitigation measures would be required.

The project would provide 28 bicycle parking spaces, to be located on the ground floor of the parking garage. In addition, the project would provide shower and locker facilities for employees.

PARKING

Comment #91

"The amount of parking on-site is well below what would be available for other Home Depots." *(Charles M. Abrams, President, Abrams Associates)*

"The Proposed Parking Garage Cannot Meet Peak Demand. Information From the Traffic Study Withheld from DEIR. The project anticipates a peak demand for 539 parking spaces on Saturday afternoons. The DEIR concludes that this is inadequate: 'Since the proposed project would include 550 parking spaces, it would meet the Planning Code requirements and meet the anticipated parking demand.'¹ Yet, the Traffic Study has other information. The Traffic Study includes a very significant additional paragraph on 'Parking Supply versus Planning Code requirements' which concludes that the parking structure won't be able to hold all the cars at peak times. 'It should be noted that parking facilities typically have an effective capacity of about 90 percent, which accounts for certain inefficiencies of the facility, and that spaces emptied cannot be immediately reoccupied. As such, during the peak parking demand periods, it may be difficult for drivers to find parking within the proposed project's parking garage.'² This information was not included in the DEIR, which seems to be a serious omission of a finding by the project's own consultant. We expect the effective capacity to be even lower than 90 percent because the garage is on three levels. For a store where consumers purchase large items, and they must push large, heavy carts to their vehicles, they prefer to park on the lower, entrance level. This is certainly the case in Colma, where people will circle the lower level or wait for vehicles to depart rather than go up the ramp to the upper level of parking. It is unacceptable to build a project when the garage cannot hold the related parking." *(Eve*

Bach, Arc Ecology Consultant; Barbara Kyle, Resident/No Depot Committee Chair; and Ron Morgan, Bernal Heights Neighborhood Center Community Organizing Coordinator)

¹ DEIR, page 6.

² Transportation Study, page 4-15.

"Page 6, paragraph 3 indicates the proposed project is required to provide 503 off-street parking spaces per code. The project would include 550 parking spaces. Further discussion of parking impacts from the project during peak periods is required. If, during peak periods, it is anticipated there will be approximately 600 vehicles during peak, additional discussion of overflow parking is needed." (*Shelley Bradford Bell, Planning Commission President*)

Response #91

Parking demand estimates for the project were based on an independent parking demand study conducted at other Home Depot stores nationwide, the purpose of which was to determine the average and peak parking demand for stores.³⁵ In general, parking facilities for most uses, including retail uses, are typically designed to accommodate the fifth highest parking demand of the year (referred to as the "design day"). In other words, a parking facility sized for the design day would be able to accommodate the anticipated parking demand for over 98 percent of the year (designing a project for the maximum parking demand typically results in a substantial over-supply of parking that is rarely used). Overall, it was determined that the peak parking demand at Home Depot stores typically occurs on Saturdays, with somewhat lower demand on Sundays and weekdays.

The DEIR discussion summarized the parking assessment contained in the Transportation Study for the proposed project.³⁶ As stated on page 60 of the DEIR, the project was estimated to have a peak demand of 502 parking spaces on a weekday and 539 parking spaces on a weekend, which includes both customer and employee demand. The total parking demand would represent the design day-parking demand, or the fifth-highest demand of the year. Since the project would provide 539 spaces (note that the analysis contained the Transportation Study and the DEIR assumed a parking supply of 550 spaces), the parking

³⁵ Barton-Aschman Associates, "Parking Demand Study – The Home Depot," January 1992. A copy of this report is on file and available by appointment for public review at the San Francisco Planning Department, 1660 Mission Street, Fifth Floor, San Francisco, as part of Case File 2001.0062E!.

³⁶ Wilbur Smith Associates, *491 Bayshore Boulevard Home Depot Transportation Study*, September 17, 2002. This report is on file and available by appointment for public review at the San Francisco Planning Department, 1660 Mission Street, Fifth Floor, San Francisco, as part of Case File 2001.0062E!.

supply would accommodate the expected parking demand. Refer to Response to Comment #6 and Section E – Staff-Initiated Text Changes and Errata, specifically pages C&R.358, C&R.360, and C&R.362 to C&R. 364, for a description of project design changes from that presented in the DEIR.

It should be noted that the parking demand rates used to determine the demand at the project include both customers and employees. Since the project site is more transit-accessible than most other Home Depot stores, it is possible that some percentage of employees would actually use transit and not drive. As such, the estimated parking demand may be somewhat less than estimated from the rates included in the parking demand study. However, as a conservative estimate of the travel and parking demand for the project, it was assumed that all visitors and employees would drive.

As discussed in the Transportation Study, parking facilities, such as parking garages, typically have an effective capacity of about 90 percent, which accounts for certain inefficiencies of the facilities, and that spaces emptied cannot be immediately reoccupied (surface parking lots typically have an effective capacity of about 95 percent). As such, during the peak parking demand periods, it may be difficult for customers to find parking within the parking garage. However, this would likely happen only a few times a year, since the parking garage would be sized to accommodate the parking demand for 98 percent of the time.

During the times when the parking demand would exceed the effective capacity of 485 spaces (90 percent of 539 spaces) in the proposed parking garage, any overflow parking demand could be accommodated along Bayshore Boulevard and Loomis Street. According to field counts conducted for the project, there are a total of about 125 on-street parking spaces along the east side of Bayshore Boulevard and both sides of Loomis Street, between Oakdale Avenue and Industrial Street. Currently, about 50 percent of these spaces (about 60 spaces) are occupied during average weekday and weekend afternoon periods, which would leave sufficient spaces to accommodate any shortfall that would occur on-site.

To accommodate customer purchases, a pick-up location would be established on the ground floor of the parking garage, adjacent to the main entrance of the store. In addition, the second

level of the parking garage would have a direct connection to the mezzanine level of the store, where a secondary pick-up location would be provided. These amenities would enhance the attractiveness of parking in the upper levels of the parking garage.

It should be noted that about four to six times a year about 26 parking spaces adjacent to the main store entrance on the ground floor are anticipated to be used for seasonal sales items. The reduction in the number of parking spaces would generally be for a one-week period, however, in December it would be for a three-week period. The use of parking spaces to accommodate seasonal sales would reduce the parking supply from 539 spaces to 513 spaces. During the December seasonal sales, the overall sales activity is less than the monthly average, and therefore the parking demand would likely be accommodated within the reduced supply of 513 spaces. If a seasonal sales period during the remainder of the year occurs during periods of peak parking demand, the peak weekday parking demand of 502 spaces could be accommodated within the reduced supply, however, the peak weekend parking demand of 539 spaces would result in a shortfall of 26 spaces. Accounting for an effective capacity of the garage of about 90 percent, the shortfall could be greater than 26 spaces. As noted above, during the times when the parking demand would exceed the capacity of the proposed parking garage, any overflow parking demand could be accommodated along Bayshore Boulevard and Loomis Street.

Comment #92

"What is Home Depot's policy re[garding] employee parking; where are they told they may park? Is the policy different at different times of the year, during sales? What is the estimate, by time of day, on how many employee cars will be at or around the Home Depot site?" (*Sue C. Hestor, Attorney at Law, on behalf of Cole Hardware*)

Response #92

According to the project sponsor, Home Depot would encourage their employees to park on the third level of the garage, in order to allow the lower two floors to be used by customers. In addition, employees would be encouraged to not park on neighborhood streets at any time.

Overall, the project sponsor estimates that there would be approximately 197 employees at the store per day, including both full-time and part-time employees, which would correspond to about 80 employees at any one time. As a conservative estimate, if all 80 employees were

to drive alone to and from work, there would be an employee parking demand of about 80 spaces. It should be noted that the parking demand for employees is included in the overall project parking demand estimated for the project.

Comment #93

"Parking Implications. This subject also clearly needs more analysis. The parking generation demand numbers need to be reviewed carefully and more backup provided since they are based on a study prepared almost 10 years ago and provided by the project sponsor. An alternative calculation should be provided to verify the numbers used in the study.

"Other big-box businesses, including Home Depot, typically require that a commercial real estate developer provide at least five (5) parking spaces per 1,000 square feet in new shopping centers. For this project, this could indicate the need for at least 765 parking spaces. The proposed project could have a deficiency of over 200 spaces. In addition, of the 550 spaces proposed for the Bayshore Home Depot, about 270 spaces are located on the third floor rooftop level, that will be very inconvenient for the majority of Home Depot's customers." (*Charles M. Abrams, President, Abrams Associates*)

"Page 60 [of the DEIR]: Parking demand is based on data that have not been available for review by the public. The demand for parking was based on an unavailable Home Depot study and checked by a count at a nearby Home Depot. Who conducted the count? Why have those data been unavailable for review?" (*Eve Bach, Arc Ecology Consultant; Barbara Kyle, Resident/No Depot Committee Chair; and Ron Morgan, Bernal Heights Neighborhood Center Community Organizing Coordinator*)

Response #93

Parking demand for the project was estimated from a parking demand study conducted by an independent consultant at other Home Depot stores nationwide.³⁷ For the study, the hourly parking demand (both employees and customers) was counted for 26 stores on weekdays and weekends. In addition, the annual sales information for each store was obtained, and the sales information for the parking survey day was compared to the annual total. Based on the ratio, the parking demand was adjusted to account for the fifth busiest day at each store. Parking demand equations were then developed for both weekday and weekend, based on the size of each facility. Although this study is ten years old, the parking demand rates are still appropriate, since they were checked against actual conditions at the Colma Home Depot store.

The actual parking demand at the Colma Home Depot store in June 2002 was compared against parking demand estimates for the Colma store using the parking demand study rates.

³⁷ Barton-Aschman Associates, "Parking Demand Study – The Home Depot," January 1992, op cit.

During the Saturday midday peak hour (which is the time period with the greatest activity), the actual parking demand at the Colma store was determined to be 367 spaces. Using the parking study rates, the Colma store (with about 113,100 gross square feet) would be estimated to have a parking demand for 449 spaces. This calculated demand is about 82 spaces higher than the actual Colma Home Depot store parking demand. As such, the parking demand estimates using the parking study rates would be sufficient to account for potential higher parking demand at the project than the national averages.

It is not clear how the commenter determined that big-box retailers, including Home Depot, typically require at least five parking spaces per 1,000 square feet in new shopping centers, since each jurisdiction and retailer have different parking requirements and standards. The project would be a stand-alone business and the parking supply was sized to meet the anticipated parking demand.

Based on architectural specifications and experience with Home Depot, the project architects have determined that 500 to 525 parking spaces is typically adequate to accommodate the parking demand of Home Depot stores for comparable size and activity. According to information provided by the project sponsor, the 12 new stores opened in the San Francisco Bay Area between 2000 and 2004 have averaged about 128,300 sq.ft. with 476 parking spaces, for an average of about 3.7 spaces per 1,000 square feet (see Table C&R.17 on page C&R.211). As such, the proposed project's 153,100 sq.-ft. store with a proposed parking garage of 539 spaces (3.5 spaces per 1,000 square feet) would be consistent with the other stores in the area. As discussed in the DEIR, the project was estimated to have a peak parking demand of 502 spaces on a weekday and 539 spaces on a weekend, which could be accommodated in the proposed parking garage.

About 239 spaces within the proposed parking garage would be located on the third level. These spaces would be directly accessed from the ramp, which would be located on the south side of the garage. This ramp would be designed to allow customers to quickly travel between parking levels, instead of having to drive around the entire level to reach the ramp. Although parking on the upper levels of the garage may be somewhat inconvenient for some customers, elevators would be provided within the store and the parking garage and a customer pick-up area would be provided on the ground floor at the store entrance with a

secondary customer pick-up area on the mezzanine level. It should be noted that Home Depot would encourage its employees to park at the third level of the garage, which would allow more customers to use the lower parking levels. Refer to Response to Comment #6 for a breakdown of the number of parking spaces by level.

Table C&R.17 Square Footage and Number of Parking Spaces for Bay Area Home Depot Stores Opened between 2000 and 2004			
Store Location	Open Date	Total Square Footage	Customer Parking Spaces
Fremont	2/22/01	131,761	464
Hayward	11/15/01	131,218	500
Hercules	12/11/03	119,285	461
Livermore	1/6/00	131,704	473
Milpitas	6/21/01	132,922	490
Milpitas – Supply Store	5/16/02	98,163	382
Morgan Hill	4/29/05	122,609	415
Oakland	6/24/04	158,195	649
San Jose / Bollinger	5/11/00	130,988	457
San Jose / Hillsdale	3/7/02	132,320	494
Watsonville	10/28/04	118,981	457
Windsor	6/28/01	131,840	465
Average of 12 Stores		128,332	476

Source: Home Depot

Comment #94

"Further study of the potential parking impacts are needed, especially with respect to the overflow of Home Depot parking onto neighborhood streets and onto neighboring businesses. Furthermore, the third floor, top level of the garage will not be effectively utilized.

"We believe that this project will result in a great unmet demand for on-street parking on Loomis, Waterloo, Industrial, Cortland, and many other nearby streets. This on-street parking will become far more convenient to customers instead of using the rooftop level of the Home Depot parking structure. The neighboring businesses will be greatly impacted by overflow parking from the Home Depot. This issue needs to be thoroughly reviewed. It is quite likely that the required mitigation would be an expanded parking facility for Home Depot, or alternatively, a smaller store. The current parking ratio is out of balance." (*Charles M. Abrams, President, Abrams Associates*)

"Parking Garage Spillover Will Increase Traffic Backups. If cars can't fit into the garage, they will either queue up on the street waiting to get in, or they will circle the area. Both activities will cause further delays and traffic tie-ups. And idling cars create higher levels of toxic air emissions.

"Parking Problems Won't Encourage More Transit Ridership. While the DEIR doesn't actually state that the garage won't hold all the cars, it does state that the effect of 'cars circling and looking for a parking space in areas of limited supply...is often offset by a reduction on vehicle trips due to others who are aware of constrained parking conditions in a given area.'¹ This would not seem very likely, given that most people who shop at Home Depot are purchasing building materials and bulky items, which can't be transported on public transit." (*Eve Bach, Arc Ecology Consultant; Barbara Kyle, Resident/No Depot Committee Chair; and Ron Morgan, Bernal Heights Neighborhood Center Community Organizing Coordinator*)

¹ Transportation Study, page 4-2.

"The current design does not accommodate peak vehicle trips, and further discussion of how on-street parking will impact traffic flow should be included in the DEIR." (*Shelley Bradford Bell, Planning Commission President, written comments*)

The parking garage will not accommodate all cars on peak days, and off-street parking as identified in the DEIR on Loomis and Waterloo streets could impact access to the parking garage." (*Shelley Bradford Bell, Planning Commission President, written comments and oral testimony*)

"A couple of matters I want to address, and No. 1 has to do with the parking configuration, and how that's going to impact traffic. Usually, commensurate with Home Depots, there is a tremendous need for some parking around the area, the greenhouse area, with materials that are being purchased in that area and being loaded in the vehicles. That's a concern, whether that's going to be commensurate with the other stores. Another concern would be the access for walking traffic. That does concern me a bit, and how the parking is going to be impacted. The number of parking spaces that are projected on the scheme does not really go a long way in satisfying parking needs at other Home Depots that I have compared to this one, and we may have a problem with that. So, some clarification is needed in that area." (*Rev. Edgar Boyd, Planning Commissioner*)

"I urge you to treat the DEIR with great skepticism, because basically I'm very skeptical about it. Basically I have three examples to share which bred my skepticism. The first is the Colma Home Depot. I have visited there before, and I can remember consistently waiting several minutes or more – and that's just off memory, and perhaps was even longer – to simply enter the driveway. And I can only imagine that would be the case for a store that is considerably larger than the Home Depot store as proposed for this property." (*Brent Daniel, Resident*)

"Parking will be affected and cars will spill at peak times onto Bayshore and side streets." (*Nic Griffin, Resident*)

"Page 42 [of the DEIR:] Roadway Network - Please explain the location and amount of curb parking on Bayshore, Cortland, Industrial, Loomis, Waterloo, Marengo, and Hilton near the project site. Are there sidewalks? Since it is likely that customers will search for on-street parking whenever there is congestion at the garage, or when they perceive that curb parking will get them in and out faster, it is likely that people will park along those streets. Parking at those locations – and the pedestrian

impacts from that parking – has not been factored into the analysis in this EIR. It must be included." (*Sue C. Hestor, Attorney at Law, on behalf of Cole Hardware*)

"The DEIR also speaks to say that there will be a loss of some public parking spaces down there, and I don't really know who uses those spaces, but I wonder if they are going to be able to park on the lot at Home Depot." (*Rachel Kesel, Resident*)

Response #94

As indicated in the DEIR on page 60, the parking demand for the project was estimated for the fifth busiest day of activity (based on a parking demand study conducted by an independent consultant at other Home Depot stores nationwide). For information on the development of project parking demand, refer to Response to Comment #93.

During times of peak occupancy, the project's parking supply may not be able to accommodate the entire parking demand. Any parking demand that cannot be met on-site would need to be accommodated on-street, such as along Bayshore Boulevard or Loomis Street (where there is currently on-street parking available throughout the day).

Field counts conducted for the project indicate that there are a total of about 125 on-street parking spaces along the east side of Bayshore Boulevard and both sides of Loomis Street between Oakdale Avenue and Industrial Street. Currently, about 50 percent of these spaces are occupied on an average weekday and weekend afternoon periods. As such, customers who could not find parking within the project's parking garage would likely be able to find nearby on-street parking. Sidewalks are currently provided along both sides of Bayshore Boulevard, Cortland Avenue, Waterloo Street and Loomis Street (inside the parking study area) and along both sides of Oakdale Avenue and Industrial Street (outside the parking study area), so any customers that parked on neighboring streets could walk to and from the project site. While most customers purchasing building materials and bulky items would not find it convenient to park on-street, some customers may find it preferable to park on-street whether or not there is parking available within the garage. It is not anticipated that occasional shortfalls in parking supply would result in an increase in the use of transit to and from the proposed project.

Vehicles searching for parking in and around the project site may add to the traffic volumes at the nearby intersections, and vehicles pulling into and out of on-street parking spaces may

somewhat impede street traffic flow. However, the low volume of these vehicles and the infrequent occurrences would not substantially affect the results of the intersection operations analysis or the operations of the adjacent streets (and the corresponding traffic and transit operations). The air quality analysis of traffic emissions considered the movement of project-related traffic, and the localized air quality impacts would not be significant.

The various changes to the configuration of the nearby streets to account for the project, such as the establishment of a left-turn pocket from southbound Bayshore Boulevard into the project site, would not result in any loss of on-street parking.

Various improvements have been proposed as part of the project to address the effects of the project on the adjacent roadway network, including the extension of the northbound left-turn pocket from Bayshore Boulevard to Cortland Avenue, a new traffic signal at Bayshore/Cortland, a new southbound left-turn pocket from Bayshore Boulevard to the project driveway, and a new U-turn pocket on Bayshore Boulevard north of the new left-turn pocket. Since these measures would be included as part of the project, as noted on page 33 of the DEIR, they would be fully funded by the project sponsor.

Although the left-turn movement at the intersection of Mission/Cortland would operate at LOS F in the future, changes to the signal at this intersection would be implemented by DPT, as part of its existing intersection improvement program. DPT has requested that the project sponsor pay for this improvement, and the project sponsor has agreed to do so. No other transportation-related mitigation or improvement measures have been proposed that would require sole action or funding by the City.

The following is in response to Commissioner Boyd's comment regarding conflicts associated with garden center operations. As indicated on Figure C&R.6 on page C&R.27, the greenhouse and garden center would be located at the northern portion of the project site. Visitor access to this section would be from the main store, and no separate entrance/exit or loading area would be provided for the garden center. It should be noted that at some existing Home Depots, the garden center operates separately and may have an additional loading area dedicated to the garden center. However, the proposed project would operate

similarly to existing stores where all purchases are conducted through the main checkout area, and no additional loading areas are provided.

Comment #95

"Also on the weekends, there are two impacts. One, I'm eventually responsible for the Alemany Farmers Market on Saturdays, and also when we have flea market on Sundays. Clearly Saturdays are high impact, because I can't find parking down there at times, and I think that should be a consideration." (*Bill Lee, Planning Commissioner*)

"I also don't see also mention in this DEIR of parking impacts on Cortland. You go to Good Life Grocery or the other stores on Cortland, and you can't find a parking spot. People are circling the blocks. We have the Union Street/Noe Valley syndrome – driving around five or ten minutes before you find a parking spot that then spreads the pressure out to the side, capillary streets. So none of that seems to have been mentioned here, and I just think that there needs to be more data and more study about the impacts all around the neighborhood." (*Chris Witteman, Resident*)

Response #95

Due to the distance of the commercial district along Cortland Avenue and the Alemany Farmer's Market from the project site (0.3 to 0.5 mile, respectively), and the fact the proposed parking garage would generally accommodate the anticipated project-related parking demand, it is anticipated that the project would not result in worsening of the parking conditions in the vicinity of the commercial district along Cortland Avenue and near the Farmer's Market. Although the parking demand associated with the Alemany Farmer's Market does commonly spill over onto Bayshore Boulevard on Saturdays, the project would not worsen these conditions, because the spillover does not extend up to Cortland Avenue.

LOADING

Comment #96

"Page 6 [of the DEIR]: There is no verifiable source of information for the following statement: 'Based on information from a similar Home Depot store, it was estimated that the proposed project would generate 30 daily delivery trips per day (approximately 15 semi tractor-trailers and 15 small trucks/vans).'

"Where is this store that the information is based on? How were the data collected? Over what period of time? By whom? What methodology was used to convert the data into projections for this project? How does this information compare to information supplied in Home Depot permit

applications to other cities throughout the country? We need to be able to review the data before we can comment on its accuracy and/or suitability as a basis for projection for the project.

"Page 60 [of the DEIR]: The project sponsor's estimate of demand for loading docks has not been documented or verified. The DEIR appears to rely on the sponsor's estimate without any supporting data.

"Page 72 [of the DEIR]: The estimate of loading impacts is based on data that are not available for review. 'Based on information from a similar Home Depot store, it was estimated that the proposed project would generate 30 daily delivery trips per day...' Which store? In what way similar? How typical? How and when were the data collected? By whom?" (*Eve Bach, Arc Ecology Consultant; Barbara Kyle, Resident/No Depot Committee Chair; and Ron Morgan, Bernal Heights Neighborhood Center Community Organizing Coordinator*)

"Last paragraph [page 6] indicates there will be about 30 daily delivery trips per day of approximately 15 semi-tractor-trailers and 15 small trucks/vans. The current project design shows the truck entry on Loomis, but no discussion of traffic impacts by these trucks to the intersections of Bayshore/Oakdale, Oakdale/Loomis, or Industrial Way/Loomis. More discussion is required of these impacts and alternative project designs to mitigate truck congestion. Further, no discussion is provided on the impact of these trucks to neighboring Loomis businesses. With four truck stalls, further discussion is warranted on the project's impact on existing businesses should trucks be queued to enter the loading area. See Site Plan Figure 2 A-4 of the DEIR." (*Shelley Bradford Bell, Planning Commission President*)

Response #96

As indicated on DEIR page 60, the estimated number of daily deliveries for the proposed project was based on information provided by the project sponsor based on the loading activity at a similar Home Depot store (Colma). Truck logs from the nearby Colma Home Depot store were used to estimate a daily average delivery demand for the Colma facility (truck logs from 2003 were used to confirm earlier loading demand estimates)³⁸, which was then adjusted to reflect the slightly larger size of the proposed project. Information from the Colma store was determined to be most appropriate for estimating the demand for the proposed project due to its urban location and similar size, and since the project sponsor anticipates similar activity levels to the Colma store for the proposed project. It should be noted that the estimate of 30 deliveries a day is consistent with the loading demand that would be estimated using the rate developed by the Planning Department, as presented in the *San Francisco Transportation Guidelines*. Using the Planning Department's composite retail rate of 0.22 daily truck trips per 1,000 square feet of retail use, the proposed project would be estimated to generate about 34 truck trips.

³⁸ The truck logs for the Colma store are available for review by appointment at the San Francisco Planning Department at 1660 Mission Street, Fifth Floor, San Francisco, as part of Case File 2001.0062E!. Truck logs included the number of trucks by day by loading characteristic (lumber, garden center, and dock).

The project was designed to ensure that sufficient loading spaces would be provided to effectively accommodate the demand. The project architects have indicated that standard Home Depot stores of similar size provide three loading docks and one at-grade loading area (for the garden center and lumber); however, some stores provide four loading docks. Due to the urban location of the project, and to ensure that the loading demand is adequately accommodated, the project sponsor is proposing to provide four loading docks, in addition to the one at-grade loading area.

Based on information obtained from the project sponsor, deliveries to the project would occur throughout the day. Most of the 30 daily deliveries would occur between 7:00 a.m. and 5:00 p.m., although some deliveries may be scheduled during the evening, nighttime, and early morning periods. Thus, on average there would be approximately three deliveries per hour between 7:00 a.m. and 5:00 p.m., which could be accommodated within the loading spaces.

Home Depot would employ an on-site loading receiving manager, who would be responsible for scheduling deliveries and to ensure that there are no waiting trucks.

In general, it is anticipated that most delivery vehicles would use U.S. 101 and I-280 to travel to and from the project site. As discussed in Response to Comment #45, Home Depot trucks typically make deliveries to several stores in a row. As such, they would usually come from or go to other stores on the Peninsula, and for these trips, using U.S. 101 would be the most convenient and direct route. The project sponsor has committed to developing access routes for all Home Depot-controlled trucks (which account for about 40 percent of all deliveries).

Delivery trucks destined to and from the project site would travel through the nearby study intersections of Bayshore/Oakdale, Bayshore/Industrial, Oakdale/Loomis, and Industrial/Loomis. The addition of about 30 delivery vehicles on a daily basis is not anticipated to substantially affect operations of these intersections, due to the low volume of truck activity on an hourly basis. In general, the effect of large trucks (such as semi tractor-trailers) is a lessening of capacity of streets due to slower movements and larger turning radii, which may temporarily affect local traffic and transit operations. The addition of a few new truck trips to the local and regional network would not likely affect the operations of the nearby streets.

and would not result in any changes to the intersection operating conditions. The weekday PM peak hour intersection operations analysis accounts for truck trips to and from the project site during the hour, as the trip generation rates were based on actual driveway counts at other Home Depot stores. Overall, the project is not anticipated to have a substantial effect to operations of the nearby intersections, and alternate project designs would not be required.

Although Loomis Street does serve other industrial and commercial uses, it is a 40-foot-wide street with one travel lane in each direction and with low traffic volumes between Oakdale Avenue and Industrial Street (about 200 to 250 vehicles during the weekday PM peak hour and about 220 to 230 vehicles during the Saturday midday peak hour). Based on the design of the project's loading facilities, delivery vehicles would be able to drive into the project site and reverse into the loading dock without impeding on-street traffic. In addition, the proposed supply of four loading spaces would be sufficient to accommodate the project's loading demand. Therefore, it is anticipated that delivery vehicles would not substantially affect operations along Loomis Street.

TRANSIT

Comment #97

"Page 51 [of the DEIR:] Transit Network - The 24-Divisadero runs 24 hours and is a major connecting line. It connects Bernal Heights to 3rd Street, and will connect Bayview/3rd Street light rail to Home Depot. When the 24 has massive problems and runs have to be dropped, Muni often truncates service at Bayshore, looping the buses back on Hilton Street. If there are problems on the 24, it is likely that service to Bayview will decrease. (The long bus stop at Cortland and Bayshore may be there because that is the 'end of the line' during owl service and when service is truncated.)

"The 44-O'Shaughnessy does not run through Bernal Heights. I think you mean the Portola District, on the other side of 280." (*Sue C. Hestor, Attorney at Law, on behalf of Cole Hardware*)

Response #97

DEIR page 51 provides a description of the existing Muni 24-Divisadero bus route. In general, this is a cross-town route that provides service between Pacific Heights and Bayview Hunters Point, and operates seven days a week with 15- to 20-minute headways. It should be noted that occasionally the eastbound bus route is turned back at Hilton Street (instead of continuing to the end of the line at Third Street). This bus line will provide a connection to

the future Third Street light rail line, which will be operational in 2005. In addition, the 24-Divisadero bus line provides late-night (owl) service, which ends at Bayshore Boulevard with a turn-around at Hilton Street.

Although the project would result in some increase to the average delay per vehicle at intersections in the vicinity of the project site, it is not anticipated that the overall increase in travel time for the Muni 24-Divisadero bus line along Cortland Avenue and Bayshore Boulevard would be substantial enough to impact operations such that additional buses would be needed.³⁹

The commenter is correct and the description of the 44-O'Shaughnessy Muni bus line is corrected. Page 53 of the DEIR, first paragraph, line one, is revised to read: "The 44-O'Shaughnessy is a cross-town route which provides travel between the Inner Richmond, Golden Gate Park, Twin Peaks, Glen Park, ~~Bernal Heights~~, **Portola, Silver Terrace**, and Bayview Hunters Point neighborhoods."

Comment #98

"Throughout the EIR, it is stated that it is conservative to assume that all employees and customers will drive to Home Depot. That may be so for calculating traffic levels of service, but it is not adequate for analyzing impacts on Muni." (*Sue C. Hestor, Attorney at Law, on behalf of Cole Hardware*)

Response #98

DEIR pages 68 through 70 present the transit impact analysis. In general, there are two types of transit impacts analyzed in the DEIR: the impacts on transit occupancy conditions by the new transit passengers generated by the project, and the impact on bus operations by the additional vehicle-trips on the roadway network.

As discussed in the DEIR pages 68 through 70, it was estimated that the project would generate relatively few transit trips on weekdays and weekends. The Transportation Study indicates that the bus routes in the vicinity of the project site currently have capacity to

³⁹ Telephone conversation between Jim Lowe, Transit Planner, Muni, and Luba Wyznyckyj, LCW Consulting, September 2, 2004.

accommodate additional passengers. As such, the project would not result in a substantial increase in the occupancy of the nearby bus lines and would not result in a significant impact in terms of transit occupancy conditions.

Regarding impacts to bus operations from the additional vehicle-trips generated by the project, please see Response to Comment #99.

Comment #99

"Transit Impacts: The DEIR and the Transportation Study both concede that the Muni and SamTrans bus lines which pass through the Bayshore corridor will be impacted by the slower traffic of vehicles coming to and from the project, and vehicles lined up along Bayshore to enter the parking garage. The Transportation Study acknowledges, '...there would be a potential for conflicts between buses pulling into and out of the curb bus stop and project-related traffic turning into and out of the garage. In addition, pedestrians waiting at the bus stop would experience higher levels of vehicle activity than currently occurs.'¹

"The DEIR also admits that 'travel times for Muni and SamTrans buses would somewhat increase.'² But it goes on to justify this by saying it will be just as bad as for non-transit vehicles. 'Transit vehicles... would experience the same delays, queuing, and levels of congestion as regular vehicular traffic... In addition, transit vehicles may experience minor delays pulling out from bus stops into the travel lanes as a result of the increased traffic volumes and queues.' This will be a particular problem for Muni's westbound 24 Divisadero bus line, which stops on Bayshore just south of the site, then must cross the three lanes of Bayshore Boulevard to make the left turn onto Cortland. Since this is where cars will be backed up to get into the parking garage, this will be a source of delays for this route. This line already has enough delays, service problems, and uncertainties for riders to endure. A city with a 'Transit First' policy should not allow development to further erode the existing transit services." (*Eve Bach, Arc Ecology Consultant; Barbara Kyle, Resident/No Depot Committee Chair; and Ron Morgan, Bernal Heights Neighborhood Center Community Organizing Coordinator*)

¹ Transportation Study, 9/02, page 4-13.

² DEIR, page 69.

"The stated environmental impacts are unacceptable. I point to the delays faced by Muni passengers." (*Shannon Dodge, Resident*)

"The bus stop south of Cortland on the east side of Bayshore will be affected as trucks pulling out will block the northbound lanes of Bayshore, causing delay for the buses." (*Nic Griffin, Resident*)

"It is absurd to think that Muni operations will not be impacted by the increased amounts of traffic, including turning movements at Cortland/Bayshore and Bayshore/Industrial. With increased congestion on southbound Bayshore between Cortland and Industrial, how is the 24 going to cut across all those traffic lanes to be able to make a left turn? Similarly for northbound traffic? Has Muni agreed that this will not delay their operations? If the 24 runs start taking longer, what is the

incremental cost of adding an additional bus during peak hours?" (*Sue C. Hestor, Attorney at Law, on behalf of Cole Hardware*)

"The buses down there are all great. They are equipped with bike racks, that help people like me get over the big hill. And those buses are also going to be impacted – not just the 24 and 9, but also the 23 that comes from Crescent – which will also suffer greatly." (*Rachel Kesel, Resident*)

"[My son] takes the 24 bus to high school. It mentions it in the DEIR, page 51, it mentions that it will affect the 24 line. As of now that line is pretty good. Delays on that are going to make it that much harder for him to go to the high school that he's chosen on the other side of town. I also think that all of these things will be affected by future stores that will come in, and in every other community where Home Depot has gone, additional large retail stores have gone in." (*Deborah Levy, Resident*)

"The 23 and 24 Muni bus lines will be severely impacted. I am concerned about the delays because I rely on these buses to get me to different parts of the city." (*Amy C. Miller and Virginia Bowen, Residents*)

Response #99

DEIR pages 68 through 70 present the transit impact analysis.

The project would result in a substantial increase in the number of vehicle-trips on the adjacent roadway network (since it was assumed that all customers and employees would drive to and from the project, this would result in a conservative estimate of the number of vehicles-trips generated by the project). As stated on page 69 of the DEIR, these new vehicles may somewhat affect operations of the Muni 9-San Bruno, 23-Monterey, and 24-Divisadero bus lines and SamTrans #292 and #397 bus lines on Bayshore Boulevard, including a potential for conflicts between buses pulling into and out of bus stops and project-related traffic turning into and out of the garage, and a potential for increased travel times. Even with the addition of project-related vehicles to the roadway network, the increase in travel delay at the nearby intersections, such as at the intersection of Bayshore/Cortland, would not be substantial enough to significantly increase travel times and warrant additional transit service in the project vicinity.

The 24-Divisadero buses traveling eastbound on Cortland Avenue would turn right onto southbound Bayshore Boulevard during the eastbound-only signal phase (with the project, there would be separate eastbound and westbound phases). As such, these buses would be able to maneuver across the three travel lanes on Bayshore Boulevard to access the southbound left-turn pocket onto Industrial Street. The increase in traffic volumes traveling

eastbound onto Cortland Avenue and turning right onto southbound Bayshore Boulevard would not be substantial enough to affect the ability of buses to make this turn.

The Muni 24-Divisadero bus stop on Bayshore Boulevard, south of Waterloo Street, and the northbound 24-Divisadero's ability to access the left-most lane at the intersection of Bayshore/Cortland, would not be affected by vehicles and delivery trucks destined to and from the project site. Since this bus stop is located more than 100 feet south of the main project driveway at Bayshore/Cortland, it is not anticipated that queues would extend far enough to affect operations of the bus stop and buses pulling out into the traffic flow and changing lanes. Although the Waterloo Street driveway would be located directly north of this bus stop, this driveway is anticipated to have limited use due to its location and access within the garage. In addition, delivery trucks entering the project would use Loomis Street and trucks leaving the project would exit onto Bayshore Boulevard, north of the bus stop. Therefore, delivery trucks would not affect bus operations at this bus stop.

Under Existing plus Project and 2015 Cumulative conditions (which assumes additional growth in the area), intersections in the vicinity of the proposed project would operate at acceptable LOS D or better, with the exception of the intersection of Mission/Cortland, which would operate at LOS F under 2015 Cumulative conditions. With implementation of the identified mitigation measure for the intersection of Mission/Cortland, this intersection would operate at LOS C during the weekday PM peak hour and LOS D during the Saturday midday peak hour. Therefore, even with increased vehicular volumes associated with the 2015 Cumulative conditions, intersection operations are not anticipated to worsen to unacceptable conditions. (For information on Home Depot's effect on retail activity in the vicinity of the proposed project, refer to Response to Comments #18, #24, and #28.) Overall, it was determined that these potential effects would not result in a significant impact to transit operations. Muni has been involved in review of the analysis included in the transportation study and DEIR, and has not identified any significant impacts.⁴⁰

See Response to Comment #48 regarding the assessment of AM peak hour conditions.

⁴⁰ Ibid.

The potential growth inducement of the proposed project is discussed in the DEIR on page 103. Also see Response to Comment #133 for additional discussion of growth inducement.

Comment #100

"I'm a resident of Bernal Heights; been there about seven years. And I at least tried to read the DEIR, and couldn't very well, but I did look at the charts. I'm not an expert on any of this; I don't know anything about traffic and urban development and all that stuff that has been talked about by the people that know more. But the sense that I got from the report, which I think everybody has agreed upon – those for and against – is that traffic will definitely increase in that area, and the air quality will be worse. It is only a degree of whether people think it is going to be a not-significant increase or a significant increase, and I think that that determines where people stand. But it is definitely going to get worse in all areas. So I would just like to say on that alone, just on the DEIR, I would be opposed to a 150,000-square-foot home improvement store that would increase traffic by over 700 cars on a weekday, and 1,100 on a weekend. I think that's a significant amount to anyone. And I don't make it to City Hall very often, and I certainly never made it to one of these hearings, but I was very, very happy to hear that on a previous item you said that you are a transit first; you have a transit-first policy. I don't see how anyone reading this DEIR could interpret it by any means being a transit-first policy." (*Larry Dean, Resident*)

"The character of this site will change dramatically to visibly a major big box site. Where in San Francisco is there a store nearly 800 feet in length - with no relationship to the street or pedestrians? This building 'reads' as a suburban auto-dependent store. Although Whole Earth and Goodman's had a lot of auto traffic, they also had a lot of customers who came on transit. Those buildings were also of a greatly reduced scale compared to Home Depot. Please discuss how this project turns the city's transit-first policies on its ear. (*Sue C. Hestor, Attorney at Law, on behalf of Cole Hardware, written comments*)

Because they have assumed that everyone is going to drive, there is no analysis of pedestrians or Muni impacts. It is just factored out of this. This project is the antithesis of a transit-first project. Their assumption is no one is going to use transit. They didn't do an analysis of increased transit ridership for the workers, let alone for their customers, and you are going to have a street frontage that is suburban street frontage." (*Sue C. Hestor, Attorney at Law, on behalf of Cole Hardware, oral testimony*)

Response #100

The project does not substantially conflict with the ten principles that constitute the City's Transit-First Policy. In general, the purpose of the policy is to emphasize the use of non-automobile modes, and to give priority to transit. The policy does not regulate the types of land uses that are allowed in the city. The ten principles as stated in the City Charter, Section 16.102. are:

1. To ensure quality of life and economic health in San Francisco, the primary objective of the transportation system must be the safe and efficient movement of goods and people.

2. Public transit, including taxis and vanpools, is an economically and environmentally sound alternative to transportation by individual automobiles. Within San Francisco, travel by public transit, by bicycle and on foot must be an attractive alternative to travel by private automobile.
3. Decisions regarding the use of limited public street and sidewalk space shall encourage the use of public rights-of-way by pedestrians, bicyclists, and public transit, and shall strive to reduce traffic and improve public health and safety.
4. Transit priority improvements, such as designated transit lanes and streets and improved signalization, shall be made to expedite the movement of public transit vehicles (including taxis and vanpools) and to improve pedestrian safety.
5. Pedestrian areas shall be enhanced whenever possible to improve the safety and comfort of pedestrians and to encourage travel by foot.
6. Bicycling shall be promoted by encouraging safe streets for riding, convenient access to transit, bicycle lanes, and secure bicycle parking.
7. Parking policies for areas well served by public transit shall be designed to encourage travel by public transit and alternative transportation.
8. New transportation investment should be allocated to meet the demand for public transit generated by new public and private commercial and residential developments.
9. The ability of the City and County of San Francisco to reduce traffic congestion depends on the adequacy of regional public transportation. The City and County shall promote the use of regional mass transit and the continued development of an integrated, reliable, regional public transportation system.
10. The City and County of San Francisco shall encourage innovative solutions to meet public transportation needs whenever possible and where the provision of such service will not adversely affect the service provided by the Municipal Railway.

As stated on page 3 of the DEIR, the project site is within an M-1 (Light Industrial) zoning district, which provides land for smaller industries dependant upon truck transportation, but allows for most other uses. The project's retail land use is consistent with the zoning designation and is similar to previous uses on the project site. Although the project's land use requires that most customers drive, this does not mean that customers and employees cannot use the adjacent bus lines if desired. The project would not result in any significant impacts to traffic, transit (including Muni bus operations), pedestrians and bicycle circulation, and does not conflict with the zoning. The size and configuration of the project would also be consistent with the M-1 zoning district.

See Responses to Comments #5 through #11 for street frontage and design issues, and Responses to Comments #115 through #126 regarding air quality issues.

Comment #101

"Public Transit Issues. This issue has not been adequately addressed. Will there be new bus stops? Where will they be located? How much new transit patronage will be generated? Can the existing bus routes accommodate this new patronage? If not, has Home Depot been required to contribute to any improvements? There are clearly many questions that the Draft EIR does not address." (*Charles M. Abrams, President, Abrams Associates*)

Response #101

The project would not include any new bus stops or require the permanent relocation of bus stops for Muni or SamTrans, since the proposed driveway locations would not affect operations of the existing stops. In addition, construction of the project would not require the temporary relocation of any Muni or SamTrans bus stops.

Due to the nature of the project's land use, it is anticipated that almost all customers would use private autos to access the project. As a result, the project would generate relatively few transit trips on weekdays and weekends, which would likely be generated by employees or customers from the nearby area. As such, there would not be a substantial increase in the number of riders on the adjacent transit lines, and transit load factors would not be affected.

Since the project would have less-than-significant transit operations impacts, no mitigation measures were required and none were proposed in the DEIR.

Comment #102

"Employee Transit policy issues - Will Home Depot be required to sell transit passes? Will Home Depot be required to have a policy encouraging transit usage? How will this be implemented? The assumption in this EIR is that all employees will drive. Please discuss how this does not meet City goals and policies." (*Sue C. Hestor, Attorney at Law, on behalf of Cole Hardware*)

Response #102

According to the project sponsor, transit subsidies are not one of the benefits provided to employees at Home Depot. However, the project sponsor would consider other means to encourage the use of alternate modes of travel, including reserving parking spaces closer to the entrance/exit for employees who carpool. As stated on DEIR page 72, the project would provide 28 bicycle parking spaces, four showers and eight clothes lockers for employees.

These facilities serve to encourage and accommodate bicycling and walking to and from work by employees.

In general, due to the nature and typical location of Home Depot stores, very few employees take transit, walk or bike to and from work. Since the project would be located in a more urban and transit/walk/bicycle-accessible area than most other Home Depot locations, it is possible that some employees may commute via these non-vehicular modes. However, for the purpose of the transportation analysis conducted for the DEIR, it was assumed that all employee trips would be via single-occupant private vehicles. This assumption results in a conservative estimate of the number of vehicle-trips and parking demand generated by the project, and therefore results in a conservative analysis of the traffic and parking impacts associated with the project. It should be noted that this assumption does not preclude the possibility and likelihood that some employees and customers would take transit to the project, and does not discourage the use of transit by employees and customers. If employees were to use transit, the number of vehicle-trips and the parking demand associated with the project would be reduced.

The City's Transit First policy (San Francisco Charter Section 16.102) provides principles to ensure safe and efficient movement of people and goods, and to encourage travel by public transportation and alternate modes, and to further invest in the public transit network. It does not, however, include City goals or specific policies/procedures or require that employees use transit. For information on the ten Transit First principles, see Response to Comment #100.

CUMULATIVE IMPACTS

Comment #103

"The cumulative analysis of the year 2015. I think, in looking at all of these, comparing these numbers to the existing ones, some of those numbers have been greatly understated. It is curious that all five of the intersections on Bayshore Boulevard are just ever-so-slightly below the City standard; you have a standard of 40 seconds of delay, above which mitigation is needed to be made. Five of the intersections are in the range of 35 to 39 seconds of delay, and there are so many. There's an awful lot different assumptions that go into that process, not the least of which is the other development in the area; growth of background traffic; the existing counts were done at a time when traffic was much lower than normal.

"Cumulative Traffic Forecasts (2015). The traffic model results shown in the DEIR for the various intersections on Bayshore Boulevard are very questionable, and do not appear to reflect the true growth in this corridor. An extremely simplified cumulative analysis was prepared for this project using a basic 1 percent per year instead of basing it on the actual potential for future development in the area. A project of this size in an area with many underutilized parcels should be required to take a more thorough approach to determining the significance of the project's contribution to cumulative conditions." (*Charles M. Abrams, President, Abrams Associates*)

"I would like the City to consider the long-term impacts. We have seen the 2015 traffic projection, but there has not been an acknowledgment in the DEIR of the other stores that would be induced into that area, and I think the City is in a position, at this point in time – per the adage of planning to fail – there has been a failure to plan for this, and a failure to account for the traffic increases that this DEIR projects, in addition to the other DEIRs; that mitigations that are proposed for Home Depot, sized as it is for the preferred alternatives – may, in combination with future development, not be adequate to deal with the traffic impacts for Cortland Avenue and Bayshore Avenue. So I would encourage the Commission and the City to take a moment to look and ask that Home Depot look at the future growth, and the City would look to the future growth impacts as has been addressed by the commenters." (*Jim Allison, Resident*)

"Pages 75 – 81 [of the DEIR]: The analysis understates cumulative traffic impacts. The DEIR does not consider daily traffic volumes. Limiting the analysis to peak hour traffic ignores the impacts caused by the full daily load, both on local streets and regional roadways. The analysis does not account, in particular, for congestion on U.S. 101 that has in effect extended the peak to most of the day, with a corresponding increase in aggregate delay." (*Eve Bach, Arc Ecology Consultant; Barbara Kyle, Resident/No Depot Committee Chair; and Ron Morgan, Bernal Heights Neighborhood Center Community Organizing Coordinator*)

"The issue about 2015, I think we should take a look at. I think the loss of service will have an impact in that neighborhood, depending on what else we do in that area." (*Bill Lee, Planning Commissioner*)

"I have heard all the comments, and I'm a lay person reading a draft EIR, as well as the supplemental traffic report, and I can tell you with my yellow highlighter that I got very concerned about the 'F' marking on traffic studies, as well as the D's, and the projection out to 2015 – with nothing taken into consideration about the proposal that we have all heard, and are aware of, of what else is going to be happening in the corridor. I'm asking you to take a look at the big picture. As a third-generation San Franciscan, San Francisco has been well known for not planning ahead, and I'm asking you as commissioners to please look at the future for the Bernal Heights area, as well as the Bayview and surrounding areas." (*Liz Linale, Resident*)

Response #103

As indicated in the DEIR on page 75, a growth rate of one percent per year was used to develop future 2015 Cumulative traffic volumes, which would result in an overall growth rate of about 15 percent between existing and 2015 Cumulative conditions. In addition, adjustments were made to the growth at specific movements at the study intersections to account for the greater potential cumulative growth. This growth rate was based on the Planning

Department's experience with traffic volumes throughout the City, and is consistent with historic traffic volumes along Bayshore Boulevard. See also Response to Comment #104 for additional details regarding the development of the future traffic volumes.

There have not been any proposals submitted to the Planning Department for new development or redevelopment of vacant or underutilized parcels in the vicinity of the project. The growth in traffic volumes, based on a growth rate of 15 percent, would account for future development in the area, plus the increase in through traffic from other developments outside the area.

Under 2015 Cumulative conditions, all study intersections would operate at LOS D or better during the weekday PM and Saturday midday peak hours, with the exception of the intersection of Mission/Cortland. As indicated on DEIR page 106, a mitigation measure has been identified to improve operating conditions at the intersection of Mission/Cortland to acceptable conditions (LOS D or better). DPT has indicated that it would be possible to modify the existing signal at this intersection to accommodate a new phase. DPT has also requested that the project sponsor pay for the full cost of this signal upgrade, and the project sponsor has agreed to do so.⁴¹

On pages 12 and 106 of the DEIR, the end of the first paragraph is revised to indicate that the project sponsor would pay for the mitigation: "With this mitigation ~~improvement~~ **measure**, the intersection would operate at LOS C during the weekday PM peak hour and LOS D during the Saturday midday peak hour. **The project sponsor would pay for the costs of this measure.**"

Since all other intersections would operate acceptably, no additional mitigation measures would be required.

The anticipated future increase in traffic volumes along U.S. 101, I-280 and the analysis on-ramps would add to the existing congestion levels on the regional roadway network, and would cause breakdowns in locations where excess capacity currently exists. Under 2015

⁴¹ Letter from Bond Yee, Director of the Department of Parking and Traffic to Tim Erney, Wilbur Smith Associates, September 7, 2004, op cit.

Cumulative conditions, all five of the study freeway on-ramps would operate at LOS F during the weekday PM peak hour and two would operate at LOS F during the Saturday midday peak hour. These impacts would be considered significant and unmitigable, and the traffic generated by the project would contribute to the levels of congestion and poor operating conditions.

The San Francisco Planning Department's guidelines for conducting transportation impact analyses focus on the potential impacts of a project during the weekday PM peak hour. In general, daily traffic volumes are not used to determine project impacts. Traffic conditions during the weekday PM peak hour are assessed because they represent the worst conditions of the local and regional transportation network. However, because Home Depot stores usually generate more traffic on weekends than weekdays, an additional Saturday midday peak hour analysis was conducted. At other times, the traffic volumes on the adjacent streets would be lower, or the project would generate fewer vehicle-trips. As such, this analysis addresses the highest potential impacts associated with the project. During the weekday PM and Saturday midday peak hours, the DEIR found that the project would not result in any significant traffic impacts. As a result, it was concluded that the project would not result in any significant traffic impacts during other periods.

Comment #104

"A more detailed, more realistic study of the cumulative (2015) impacts of the Home Depot should be done, particularly with respect to the impacts on Bayshore Boulevard between Silver Avenue and Cesar Chavez [Street]."

"The traffic forecasts do not appear to include any other traffic from 'induced growth' projects that will surely be developed on nearby vacant properties, and underutilized properties." (*Charles M. Abrams, President, Abrams Associates*)

"Projections of Future Traffic Growth are Seriously Underestimated. The Transportation Study makes predictions about future traffic conditions, in the year 2015, by applying a simple growth factor to 'current plus project' projections. Yet, this methodology completely overlooks the reality of the true growth factors that the opening of a big box project like Home Depot will create. Once one big box store opens in an area, it launches an avalanche of development of other big box stores nearby. One only needs to look at nearby Colma or Emeryville to see this trend. Home Depot was one of the first anchors in both of those areas, which have since seen explosive big box development, and the accompanying traffic nightmares. Even now, Pier One has a lease option on an adjacent property on Bayshore Boulevard, contingent on the Home Depot project being built. And the Planning Department has plans to zone the whole Bayshore corridor for big box development, making this trend a certainty. So, all the estimates on future traffic impacts for this area are seriously

under-represented because they ignore this inevitable explosive big box growth. All of the traffic estimates for 2015 need to be recalculated." (*Eve Bach, Arc Ecology Consultant; Barbara Kyle, Resident/No Depot Committee Chair; and Ron Morgan, Bernal Heights Neighborhood Center Community Organizing Coordinator*)

"Again, you must include in your cumulative analysis new development – substantial new development – in the Bayshore corridor since that is what is planned for this corridor, and Home Depot is assumed to be an 'anchor' for new development." (*Sue C. Hestor, Attorney at Law, on behalf of Cole Hardware*)

"Future traffic impacts in the report do not consider that Home Depot is one of many stores to go in. In Emeryville, several other large stores followed the Home Depot project. We know that Pier One Imports will go in next to Home Depot if they get approval for this project. Potential growth in the area needs to be considered in future traffic impacts." (*Amy C. Miller and Virginia Bowen, Residents*)

Response #104

At the time the DEIR was prepared and to date, the San Francisco Planning Department has not received any project information or future development plans for any site along Bayshore Boulevard, and has not received any project applications for a Pier One store on Bayshore Boulevard. In addition, there are no Planning Department plans to rezone Bayshore Boulevard into a "big box retail" corridor. Bayshore Boulevard is included in the San Francisco Redevelopment Agency's Bayview Hunters Point Survey Area, and the project area is designated for a continued mix of industrial and commercial uses. The growth rate of one percent per year would account for general increases in development activity in the area. As such, the traffic forecasts used for the project analysis in the DEIR were considered appropriate.

For the development of future 2015 Cumulative conditions, an annual growth rate of one percent was used, plus adjustments to the growth at specific movements at the study intersections to account for greater potential cumulative growth. It should be noted that when the existing traffic counts for the project were conducted (spring of 2001, fall of 2001, and winter of 2002), the nearby OfficeMax store at 625 Bayshore Boulevard was in business; therefore, the vehicle trips associated with that retail use are included in the base counts used in the analysis.

These future growth numbers would account for reasonably expected development in the vicinity of the project, including any new uses "induced" by the presence of the project.

Furthermore, any large development projects along Bayshore Boulevard and any future rezoning of Bayshore Boulevard would require separate environmental review, including an updated analysis of cumulative conditions.

It should be noted that the ongoing Bayview Hunters Point Redevelopment Projects and Rezoning is currently undergoing environmental analysis.⁴² This study is currently evaluating future year 2025 Cumulative conditions, using a new travel demand model created by the San Francisco County Transportation Authority (SFCTA). Using a different methodology than that used for the DEIR, this model estimated the future travel demand for the nine counties of the San Francisco Bay Area, based on land use and employment projections developed and adopted by the Association of Bay Area Governments (ABAG). These totals were adjusted by the San Francisco Planning Department to account for known and upcoming projects, and to factor in ongoing area-wide planning efforts such as the Bayview Hunters Point development. Use of the year 2015 for analysis of future conditions for the proposed project is standard and reasonable for estimating cumulative impacts of a single development proposal whose impacts will occur near term. Analysis of the incremental impacts of the proposed project in conjunction with growth likely to take place over the next decade provides a more meaningful picture of the individual project's contribution to any significant cumulative effects. On the other hand, use of the year 2025 for analysis of future cumulative conditions for the Bayview Redevelopment Plan is reasonable and appropriate as that analysis considers the impact of a broader and longer-term redevelopment plan, which is itself a compilation of many, possible future cumulative projects that may or may not be implemented over the 20-year horizon.

A sensitivity analysis was conducted to determine if the growth projected by the SFCTA Model would be consistent with the growth assumed for the 2015 Cumulative analysis as documented in the DEIR. For this effort, the average annual growth rate from Existing conditions to year 2025 Cumulative conditions (based on the SFCTA Model output) was determined for the weekday PM peak hour. At the intersections that were assessed in both the Bayview Hunters Point Redevelopment Projects and Rezoning analysis and the proposed

⁴² Bayview Hunters Point Redevelopment Projects and Rezoning Draft EIR, October 19, 2004. This report is on file and available for public review by appointment at the San Francisco Planning Department, 1660 Mission Street, Fifth Floor, San Francisco, as part of Case File 1996.546E.

project (Bayshore/Oakdale, Bayshore/Industrial and Bayshore/Silver), the annual growth rate based on the SFCTA Model output would be slightly higher than the growth rate used for the DEIR, due to the additional projected development within the Bayview Hunters Point area that would occur by 2025. (It should be noted that the land use projections for 2025 conditions in the SFCTA Model exceed the ABAG forecasted growth for San Francisco.)

This difference in average growth rates would result in a minor increase in the traffic volumes at the study intersections for 2015 Cumulative conditions. As a result, future 2015 Cumulative conditions were also estimated using the growth rates developed from the SFCTA Model. Overall, it was determined that the 2015 Cumulative intersection operating conditions using the SFCTA Model growth rates would be similar to the 2015 Cumulative conditions developed for the DEIR (LOS D at the intersection of Bayshore/Oakdale, LOS D at the intersection of Bayshore/Industrial and LOS F at the intersection of Bayshore/Silver, as compared to LOS D for all three intersections in the DEIR). However, the intersection of Bayshore/Silver can be improved to LOS D by establishing a dedicated northbound left-turn phase (which was previously identified as an improvement measure on page 110 of the DEIR), which would operate at LOS D, as reported in the DEIR for this intersection.

Preliminary results for 2025 Cumulative conditions from the transportation analysis conducted for the Bayview Hunters Point Redevelopment Projects and Rezoning project indicate that the land use projections between 2015 and 2025 would result in a continued growth in traffic volumes along Bayshore Boulevard. Overall, it was determined in that analysis that of the three common study intersections, the intersections of Bayshore/Industrial and Bayshore/Silver would operate with unacceptable conditions of LOS E or LOS F in conjunction with implementation of the redevelopment plan. Feasible mitigation measures have not been identified for these two intersections, and the impacts have been determined to be significant and unavoidable.

To supplement the assessment of 2025 Cumulative conditions from the Bayview Hunters Point Redevelopment Projects and Rezoning project, the growth rate used to develop 2015 Cumulative conditions with the proposed project was extended to year 2025. During the weekday PM peak hour, the study intersections of Bayshore/Oakdale, Bayshore/Industrial, and Bayshore/Silver would operate at LOS D, LOS E and LOS D, respectively, under these

2025 Cumulative conditions. The intersection operating conditions would be similar to, or better than, those developed from the SFCTA Model for the Bayview Hunters Point project.

Overall, although the methodologies, growth rates, and future years for the analysis of the proposed project and the Bayview Hunters Point Redevelopment Projects and Rezoning project are different, the results of the analyses would be similar, in terms of intersection operating conditions at the common study intersections of Bayshore/Oakdale, Bayshore/Industrial, and Bayshore/Silver. As such, the intersection analysis contained in the DEIR would be considered consistent with the analysis conducted for the Bayview Hunters Point Redevelopment Projects and Rezoning project, and the results using the one percent per year would be consistent with growth rates developed from the SFCTA Model output.

Comment #105

"The traffic forecasts do not appear to consider the major changes that will take place in the Third Street corridor that will clearly cause an increase in traffic on Bayshore Boulevard, especially large trucks." (*Charles M. Abrams, President, Abrams Associates*)

"Pages 75 and 76 [of the DEIR]: Assumptions about cumulative conditions underestimate future traffic congestion on Bayshore Boulevard. The discussion of cumulative conditions assumes that the standard background traffic growth rate that is applied generally in the analysis of San Francisco projects will apply in a situation where major changes to traffic patterns are planned. This general assumption is inapplicable to this project because truck traffic that can no longer use Third Street will be rerouted to Bayshore Boulevard. It further appears that this highly optimistic projection also assumes that there will be bridges over Yosemite Slough – a project that is unlikely given its severe environmental impacts and high cost. These assumptions require the EIR to redo the analysis of cumulative traffic impacts and realistic assumptions." (*Eve Bach, Arc Ecology Consultant; Barbara Kyle, Resident/No Depot Committee Chair; and Ron Morgan, Bernal Heights Neighborhood Center Community Organizing Coordinator*)

Response #105

As discussed in the DEIR on pages 75 through 77, the *Bayview Hunters Point Community Revitalization Concept Plan*⁴³ outlined plans to develop a new truck route for the Third Street corridor, which would restrict trucks on Third Street, establish a new truck route on Bayshore Boulevard, and establish new truck routes on several east/west streets to serve Hunters Point Shipyard and the South Basin industrial uses. In addition, the *Concept Plan* called for construction of a new bridge over Yosemite Slough (this proposed bridge was not included in

⁴³ City and County of San Francisco, Redevelopment Agency, *Bayview Hunters Point Community Revitalization Concept Plan*, 2002.

the traffic analysis for the proposed Home Depot project). Based on data contained in the *Third Street Light Rail Project EIS/EIR*⁴⁴ (which did not assume construction of a bridge over the Yosemite Slough), it was estimated that implementation of the new truck route plan and implementation of the Third Street light rail would result in only a minor increase in truck volumes along Bayshore Boulevard – up to 20 trucks during the weekday AM peak hour and 10 trucks during the weekday PM peak hour. These anticipated increases in truck traffic are within the future growth projections for Bayshore Boulevard, and therefore have been accounted for in the analysis.

Comment #106

"The Draft EIR also uses an overly conservative standard of significance for cumulative traffic effects, with the result being that the project's contribution to cumulative impacts in 2015 appears far larger than it truly will be. The Draft EIR (at pages 79-81) assesses the project's contribution to impacted intersections and on-ramps in 2015, and bases the significance determinations on the project's percentage contribution to the traffic growth between now and 2015, as opposed to the project's percentage contribution to the total traffic volumes at the impacted locations. We believe that use of the latter numbers (which are, of course, much lower) is the approach suggested by CEQA. CEQA directs that the EIR first consider whether the cumulative (2015) conditions at intersections and on-ramps are significant, looking at the future total amount of projected traffic at the impacted locations. Then, to calculate the project's effects, the EIR must determine whether 'the effects of the project are cumulatively considerable' at those significant locations. CEQA Guidelines § 15064(i)(1). 'Cumulatively considerable' means that the incremental effects of an individual project are considerable when viewed in connection with past projects, the effects of other current projects, and the effects of probable future projects.' Id. Particularly since the term 'past projects' (i.e., the existing environmental setting) is used, the direction is to consider the amount that the project contributes to the overall, total traffic problem, not just to the increase in traffic between now and 2015. Again, we are not necessarily recommending that the City alter the conservative approach of the Draft EIR, but we do think it is important for decision-makers to understand the conservative nature of the approaches selected, which likely overstate project impacts." (*Anna C. Shimko, Attorney at Law for Home Depot*)

Response #106

The San Francisco Planning Department looks at both the contribution of project-generated vehicle-trips to the total 2015 Cumulative conditions traffic volumes, and to the growth in traffic volumes between existing and 2015 Cumulative conditions. The project's contribution to the anticipated growth would be considered significant to study freeway on-ramps operating at LOS F (all five on-ramps during the weekday PM peak hour, and U.S. 101 at

⁴⁴ City and County of San Francisco, Planning Department and Federal Transit Administration, *Third Street Light Rail Project Final EIS/EIR*, November 1998. This report is available for public review by appointment at the San Francisco Planning Department, 1660 Mission Street, Fifth Floor, as part of Case File 96.281E.

Alemany and U.S. 101 at Bayshore during the Saturday midday peak hour) and at the intersection of Mission/Cortland during both the weekday PM and Saturday midday peak hours.

Comment #107

"Page 7, last paragraph indicates that future operating conditions on 101 and 280 will worsen and that the proposed project's contribution to the poor on-ramp conditions would be considered a significant unavoidable cumulative impact. This requires additional discussion of improvement conditions that could be provided by the project sponsor, as well as further analysis of the proposed design for alternatives that may address and alleviate this impact." (*Shelley Bradford Bell, Planning Commission President*)

Response #107

Freeway on-ramp operations are dictated by the traffic volumes on mainline freeways. By 2015, there is anticipated to be a substantial increase in traffic volumes from future development in San Francisco and the region, resulting in an increase in congestion on U.S. 101 and the nearby on-ramps. As a result, all five of the study on-ramps would operate at LOS F during the weekday PM peak hour in 2015. In general, the poor operating conditions at the study on-ramps would be a result of the anticipated increase in traffic volumes along the freeway mainline.

To alleviate poor operating conditions along U.S. 101, I-280 and the study on-ramps, additional freeway mainline capacity would be needed. Any potential improvements to the on-ramps, including the provision of additional lanes or wider shoulders, would not allow for more vehicles to enter the freeway. So, any such on-ramp improvements would not result in substantial enhancements to conditions at the on-ramp junction with the mainline travel lane.

As a result, the project sponsor would not be able to implement any improvement or mitigation measures to reduce the significant impact at the study intersections, and the project's contribution to the future on-ramp conditions would be considered a significant unmitigable impact. If the Planning Commission were to approve a project that would have an adverse environmental effect, it is required under CEQA to balance the economic, legal, social, technological, or other benefits of the project against its unavoidable environmental risks. In order to approve the project, the Planning Commission must issue a Statement of

Overriding Considerations that would state the specific reasons to support its action supported by substantial evidence in the record.

With all project alternatives (as documented on pages 115 through 127 of the DEIR), there would still be LOS F operating conditions at the study freeway on-ramps, and each alternative would continue to have significant unmitigable traffic impacts at the five study on-ramps, with the exception of the No Project alternative and Alternative C (60,000-square-foot store), which would have unmitigable impacts at four of the five study on-ramps (none of the alternatives would have significant air quality impacts). In addition, changes to the access plan for the project (i.e., relocating driveways) would not result in a rerouting of traffic patterns that would result in fewer vehicles on the regional roadway network. See Response to Comment #74 for the analysis of six access plan options for the project. It should be noted that under the various access options, the project would continue to have significant unmitigable impacts at the five study on-ramps.

OTHER TRANSPORTATION ISSUES

Comment #108

"The DEIR does not address congestion impacts to the neighborhood. The DEIR has a very limited portrayal of the significance of increased congestion. The DEIR considers the impact of congestion only in terms of time to access the freeway or to make turns. It does not consider the impact of having streets that are continuously impassable and clogged on the neighborhood and the quality of life for people who live in it. It also does not consider the public safety implications of having clogged access to areas to which there are few options for access to emergency vehicles." (*Amy D. Kyle, Ph.D., M.P.H., Resident*)

"We are close to SF General Hospital, a regional Trauma Center. Bayshore Boulevard feeds directly onto this Potrero Avenue site. Has the impact of this congestion been considered on emergency services for our county? I also wonder about the impact upon emergency services to Bernal Heights. We do have a fire station locally, but what about police, ambulance, and other essential services?" (*Eugenie Marek, Resident*)

Response #108

It is not anticipated that the proposed project would have any public safety implications with respect to emergency vehicle access. While the project would result in an increase in the number of vehicles on roadways in the vicinity of the project site, it would not result in

oversaturated traffic conditions on the roadways, conditions that may impede emergency vehicles. In addition, although the project would result in an increase to the average delay per vehicle at the study intersections, these increases are not anticipated to result in substantial congestion or lengthy delay to traffic flow. As indicated in the DEIR on page 61, all study intersections in the vicinity of the proposed project would operate at acceptable LOS D or better under Existing plus Project conditions and under 2015 Cumulative conditions (with implementation of the proposed mitigation measure at the intersection of Mission/Cortland). The anticipated increase in vehicles on eastbound and westbound Cortland Avenue (106 vehicles during the weekday PM peak hour, and 159 vehicles during the Saturday midday peak hour) would not be sufficient to substantially affect traffic operations as to impede emergency vehicle access to residents and businesses along the street.

For discussion of improvements that would be implemented to reduce the effects of vehicles on the Bernal Heights neighborhood as part of the *South Bernal Heights Traffic Calming Study* (Final Report, November 2002), see Response to Comment #54.

Comment #109

"You are all planning professionals; I'm sure you have heard of Jane Jacobs, a woman who wrote about community, and I don't know if this is coming under the rubric of an EIR, but it seems to me that an environmental impact is a sort of immunity bill, and if we're going to have big-box alley down there, we're going to have a deracinated, sterile community like you have now in Colma. I think that should have been looked at: how this will tie in with transit; how it will tie in with foot traffic – I don't see any of that here." (*Chris Witterman, Resident*)

Response #109

Issues related to the appropriateness of the project, the relevance of community planning commentary, and the works of well-known urban planners are beyond the scope of the EIR. The purpose of an EIR is to identify potential environmental effects associated with the construction and operations of a new project. As part of the analysis, significant impacts are identified and mitigation measures are developed to reduce the impacts to less-than-significant levels where feasible, and significant unmitigable impacts are identified. If the Planning Commission were to approve a project that would have an adverse environmental effect, it is required by CEQA to balance the economic, legal, social, technological, or other benefits of the project against its unavoidable environmental risks.

Land uses and relevant public plans for the project area are discussed in Responses to Comments #18, #26, #27, and #30. As noted on page 3 of the DEIR, the project is a permitted use, is consistent with the zoning designation and is similar to previous uses on the project site, as well as other businesses in the area. The compatibility of the project with *General Plan* policies will be considered by decision-makers as part of their decision whether to approve or disapprove the proposed project and any potential conflicts identified as part of that process would not alter the physical environmental effects of the proposed project.

The DEIR did address transit and foot traffic (pedestrian impacts) as part of the transportation assessment conducted for this project. Impact analyses were conducted for all modes of travel, including transit and pedestrians. The DEIR pages 68 through 72 present the transit and pedestrian impact analyses. Overall, there would be no significant impacts to transit and pedestrian circulation and conditions.

Due to the nature and location of Home Depot stores, very few customers and employees take transit, walk or bike to and from the project site. Since the project would be located in a more urban and transit/walk/bicycle-accessible area than most other Home Depot locations, it is likely that more employees and visitors may travel to and from the project via these non-vehicular modes.

See also Response to Comment #5 regarding pedestrian access to the project site, and Responses to Comments #37, #38, and #39 concerning urban design and the project streetscape.

Comment #110

"I live in Bernal, and I'm a third generation San Franciscan. I believe that the DEIR makes it clear that Home Depot on Bayshore is not going to be good for Bernal, or for the rest of the city. I think that it completely underestimates the traffic impacts, and not only that, but the social impacts this will have on the city. I'm going to start by talking about the two things that affect me the most. I have two children, and one is in 5th grade and one is in high school. The 5th grader relies on Laidlaw buses, the yellow buses, to get to school, as do most of the kids in the public schools in the city. And Laidlaw is on the other side of Bayshore. My kids get on the school bus at 7:15 in the morning to get to school, and the kids who come from Bayview get on that bus at 10 to 7:00. I think there is no doubt that there will be some delay at those hours on Bayshore because of the traffic. Those are the peak hours for contractors and carpenters to go buy stuff at a place like Home Depot.

So Laidlaw: Even a 10-minute delay to have those kids get on the bus at Bayview at close to 6:30 in the morning – is close to denying them the option of even going to school at some of the other schools in the city. (*Deborah Levy, Resident, oral testimony*)

"The traffic impacts will be huge, and even bigger as other large retail stores join Home Depot. This will slow down Laidlaw school buses in the mornings, as well as the 24 bus my son takes cross-town to his high school." (*Deborah Levy, Resident, written comment*)

"The proposed Home Depot, if built as planned on that huge scale, will cause traffic along Bayshore Boulevard and at the freeway on-ramps and off-ramps that will be irreversible and unacceptable. As it is now, Bayshore is an extremely busy street, and at peak hours the traffic slows to a crawl and is backed up. As the school bus company is located on Jerrold Avenue near Bayshore, the school buses that transport our children will be captive to the additional traffic delays along Bayshore Boulevard." (*Rosanne Liggett, Resident*)

Response #110

The additional traffic generated by the proposed project and increase in vehicle delays at the study intersections are not anticipated to substantially impact the operations of the Laidlaw school buses, although their travel times during peak periods of street traffic may somewhat increase. DEIR pages 61 through 68 document the increase in vehicular delays and levels of service conditions at intersections most likely to be affected by the project. Under Existing plus Project conditions during the weekday PM peak hour all study intersections would operate at acceptable levels of service (LOS D or better), although the average delays per vehicle would somewhat increase over existing conditions. Response to Comment #48 describes the results of the assessment of weekday AM peak hour conditions at the study intersections. In general, these intersections would operate with similar conditions as during the weekday PM peak hour (LOS D or better). As a result, additional delays to Laidlaw buses as a result of the project would be minimal during this time.

The project is not anticipated to affect the operations of school buses pulling into and out of the Laidlaw school bus yard north of Oakdale Avenue at Jerrold Avenue and Napoleon Street. School buses generally leave the bus yard before 7:00 a.m. to pick up students at home, and leave the bus yard by 2:00 p.m. to pick up students at school. These times do not overlap with the peak periods of traffic congestion on Bayshore Boulevard. As such, school buses would not be delayed substantially due to vehicles destined to and from the project.

The travel demand to and from the project in the morning (before 7:00 a.m., when Laidlaw buses leave the yard to pick up students at home) and early afternoon (before 2:00 p.m., when

Laidlaw buses leave the yard to pick up students at school) is anticipated to be substantially less than during the PM peak hour. Since the morning and early afternoon traffic volumes and levels of congestion on Bayshore Boulevard are generally lower than in the evening, it is not anticipated that the project would substantially impact or delay Laidlaw bus operations. Based on the results of the intersection operations analysis, the project is anticipated to increase delays to Cortland Avenue traffic at the study intersections of Cortland/Andover and Cortland/Folsom by less than five seconds per vehicle.

Comment #111

"Home Depot is not like any other store. People will come from all around. If you were to have a project such as a market, it would have less traffic implications for Bernal Heights." (Amy C. Miller and Virginia Bowen, Residents)

Response #111

The distribution of customers to the proposed Home Depot was based on a market research analysis conducted by Home Depot. In general, the trip distribution rates developed from the market research analysis are similar to those established in the *San Francisco Transportation Guidelines* for retail uses, such as a supermarket, in this quadrant of the city, except that the market research analysis does not assume any customers from the North Bay or East Bay due to the location of other Home Depot stores. Comparison of the trip distribution from the market research analysis versus distributions from the *San Francisco Transportation Guidelines* for retail uses is as follows: Superdistrict 1 with four percent of the trips versus six percent from the *San Francisco Transportation Guidelines*, Superdistrict 2 with eight percent of the trips versus nine percent from the *San Francisco Transportation Guidelines*, Superdistrict 3 with 59 percent of the trips versus 61 percent from the *San Francisco Transportation Guidelines*, Superdistrict 4 with five percent of the trips versus five percent from the *San Francisco Transportation Guidelines*, and 24 percent from outside of San Francisco versus 19 percent from the *San Francisco Transportation Guidelines*.

As discussed in the DEIR on pages 57 and 58 and previously in Response to Comment #41, the travel demand for the project was based on counts of similar Home Depot stores throughout California. Overall, it was estimated that the project would generate 848 vehicle-trips during the weekday PM peak hour and 1,268 vehicle-trips during the Saturday midday peak hour.

The San Francisco Planning Department has standard trip generation and modal split rates for supermarkets, which are published in its *Transportation Impact Analysis Guidelines for Environmental Review* (October 2002) document. These rates were developed by the Planning Department as a compilation of data from various studies and sources, including the *Citywide Travel Behavior Study*, the *ITE Trip Generation* manual and special purpose studies, several of which were conducted in San Francisco. A 153,100 sq.-ft. supermarket at the project site would generate about 1,264 vehicle-trips during the weekday PM peak hour. This total would represent about 49 percent more vehicle-trips than what is projected to be generated by the proposed project. A 70,000 sq.-ft. supermarket and an 83,100 sq.-ft. general retail establishment at the project site would generate about 1,005 vehicle-trips during the weekday PM peak hour, which would be about 19 percent more vehicle trips than the proposed project.

Comment #112

"I have reviewed the Draft EIR for the proposed Home Depot at 491 Bayshore Boulevard, and have a number of comments on the EIR. I am also suggesting that there are several areas where additional information is required in order to complete the environmental review of the project.

"The proposed project is a 153,000-square-foot Home Depot with 550 parking spaces that is planned for the 5.7-acre Goodman site on Bayshore Boulevard in San Francisco. It will generate over 12,000 vehicle trips per day, with about 1,200 trips during the peak hour. This is a very significant generator for the City.

"The Draft EIR is deficient and needs to be expanded in several areas of traffic and transportation. First of all, the traffic mitigations required of Home Depot are less than sufficient. A more thorough economic analysis is needed to balance the impact of new Home Depot traffic, and the need to upgrade the streets, traffic signals and other elements of the traffic system in this part of San Francisco." (*Charles M. Abrams, President, Abrams Associates*)

Response #112

While the project would generate a substantial number of vehicle-trips on a daily basis, it would not result in any significant traffic impacts under Existing plus Project conditions. Under 2015 Cumulative conditions, the project would have a significant contribution to the poor operating conditions at the intersection of Mission/Cortland and at the five freeway on-ramp locations. The mitigation measures identified in the DEIR on page 106 for the intersection of Mission/Cortland would mitigate operating conditions from LOS F (during both the weekday PM peak hour and the Saturday midday peak hour) to LOS C during the

weekday PM peak hour and LOS D during the Saturday midday peak hour. At the freeway on-ramp locations, the impacts would be considered significant and unmitigable. No other significant impacts were identified, and therefore additional mitigation measures were not proposed. The improvement measure identified in the DEIR on pages 110 and 111 at the intersection of Bayshore/Silver for 2015 Cumulative conditions would also improve operations of the northbound left-turn movement from LOS F to LOS E, while the overall intersection operating conditions would continue to operate at LOS D. The project was determined not to contribute significantly to 2015 Cumulative conditions at this location.

As indicated in the DEIR on page 60, the parking demand was calculated for the fifth busiest day. Parking demand for the project was estimated from a parking demand study conducted by an independent consultant at other Home Depot stores nationwide.⁴⁵ For the study, the hourly parking demand (both employees and customers) was counted for 26 stores on weekdays and weekends. In addition, the annual sales information for each store was obtained, and the sales information for the parking survey day was compared to the annual total. Based on the ratio, the parking demand was adjusted to account for the fifth busiest day at each store. Parking demand equations were then developed for both weekday and weekend, based on the size of each facility. Thus the parking demand of 502 spaces during the weekday and 539 spaces during a weekend day, compared to the proposed supply of 539 parking spaces, indicates that the parking demand could be accommodated within the proposed supply (note that the proposed parking supply of 550 spaces in the DEIR has been subsequently reduced to 539 spaces). Any shortfall in parking spaces, due to a typical lower effective capacity of the garage, could be accommodated in the project vicinity, mainly along the east side of Bayshore Boulevard or on Loomis Street. It is anticipated that the upper levels of the garage would be effectively utilized, since employees would be encouraged to use the top level for parking, and because there would be a connection from the garage to the mezzanine level of the store, which would make parking and shopping easier to use than parking on-street on Bayshore Boulevard or Loomis Street. Also see Responses to Comments #91 and #93 regarding parking impacts.

⁴⁵ Barton-Aschman Associates, "Parking Demand Study – The Home Depot," January 1992, op cit.

The DEIR included a comprehensive assessment of future 2015 Cumulative conditions for the weekday PM peak hour and Saturday midday peak hour on pages 75 through 81. This assessment included the operations analysis of the five major intersections on Bayshore Boulevard (at Silver, Industrial, Cortland, Oakdale, and Jerrold/U.S.101 northbound off-ramp), and at five freeway on-ramps. As noted above, mitigation and improvement measures were developed for 2015 Cumulative conditions.

Comment #113

The following comments pertain to general concerns about the potential traffic conditions related to the proposed project.

"I live on the corner of Putnam and Jarboe Avenues. The transportation study has said that cars will come this way to get to Home Depot. These streets are already crowded on Saturdays and Sundays with traffic for the farmer's market and the flea market. Putnam is too narrow for two cars to pass in many places. Traffic will be horrendous if Home Depot is allowed to use Cortland Avenue as its driveway. Please note: I am a general contractor and I do not want Home Depot in my neighborhood to increase the traffic and pollution." (*Scott Barlow, Resident*)

"The third area is the DEIR was looking at side streets in the neighborhood. I'm realizing that today I will probably no longer go down Putnam Street, which is a feeder on to Alemany, because every time I go down that street I take my life in my hands and I'm thinking, 'If there is more traffic, I can only imagine considerable traffic accidents if not fatalities as a result of such an increase in traffic.' So I urge great skepticism with respect to the DEIR and its effect on traffic, and consequently its spillover impact on air pollution, and I urge you to reject it and look for a stronger and more thorough evaluation." (*Brent Daniel, Resident*)

"My husband and I bought a home in Bernal Heights last year. We were attracted to the neighborhood after having rented there for a year and did not want to leave. I believe that the implementation of a Home Depot on Bayshore Boulevard will have severe negative repercussions on the neighborhood. [I am concerned about] increased traffic on Cortland Street (increasing danger, decreasing charm) on Bayshore (highway access will be harder), on Potrero (as an alternative N-S axis)." (*Melissa M. Diagana, Resident*)

"The stated environmental impacts are unacceptable. I point to the effects on local streets and intersections, just to name a few." (*Shannon Dodge, Resident*)

"I have two small children and walk, drive, and bike in Bernal Heights every day. I am concerned about the traffic congestion and the heavy volume of traffic Home Depot would bring to a quiet residential neighborhood. These cars would use our neighborhood as a freeway across town and the streets can not accommodate this amount of traffic." (*Jean Field, Resident*)

"The Environmental Impact Report is very alarming. The increase of traffic and air pollution will very negatively affect daily life here on the south face of Bernal Heights." (*Mary Fitzgerald, Resident*)

"It will lead to major traffic congestion along Bayshore Boulevard, the freeway entrances nearby and especially in Bernal Heights along Cortland Street. Muni riders will experience increased delays. The parking garage won't be able to handle all the cars coming to that store. Please do not allow this Home Depot here." (*Ellen M. Frank and Joseph Majer, Residents*)

"I am a resident of Bernal Heights and would like to comment on the Environmental Impact Report for the proposed Home Depot project at 491 Bayshore Boulevard. As I live on the eastern part of Bernal Heights, I am a frequent user of Cortland Avenue and Bayshore Boulevard as pedestrian, driver, and Muni rider.

"Bernal Heights is a neighborhood of particularly narrow streets. The added traffic to those streets will be a hazard to pedestrians and drivers alike. There is a Senior Center on Cortland Avenue and an active program for frail elders in the neighborhood. There have already been injury accidents to frail seniors in the Cortland area. This can only get worse as drivers impatient with long waits fail to wait at pedestrian crosswalks." (*Nic Griffin, Resident*)

"I live between Mission Street and Holly Park Circle, and I am sure that overflow traffic will crowd my street when Cortland backs up all the way to Home Depot and possible additional 'big box' stores." (*Phoebe Grigg and Jim Miglino, Residents*)

"It will have irreversible negative impacts on surrounding intersections and neighborhoods. The report says many intersections will be affected negatively even as far away as Mission and 30th. With mitigations including traffic lights, this intersection will still be a huge mess.

"If you are familiar with Bernal Heights, you know that many streets are narrow and cannot handle the additional traffic such a popular big box store would create." (*Susan Hershey and Judge Auffinger, Residents*)

"The current traffic congestion is already high and dangerous. Motorists ignoring stop signs and pedestrians (particularly the elderly and children) is a huge problem. Increased traffic on Cortland and other west/east streets will be overwhelming." (*Alyson Jacks, Resident*)

"Primarily I am concerned with dramatically increased traffic along Cortland Avenue and Bayshore Boulevard. The streets of Bernal Heights are narrow to begin with. Parking will be in shorter supply, Muni will be delayed, air pollution will be increased. Our neighborhood will be negatively impacted if Home Depot moves in.

"There's a Home Depot five miles south of this location in Colma. The parking lot and traffic there are both congested." (*Ken Kirsch, Resident*)

"I am concerned because of the traffic. I don't want to have to get ready one hour in advance to go to one of my activities because of the traffic. Also, with all of the pollution, I'll feel less comfortable living here. The new cars that will come will give off tons of pollution in the bumper-to-bumper traffic which will also waste our limited amount of oil." (*Joshua Levy, Resident*)

"This is a neighborhood and already too much traffic over the hill. Dangerous for families and kids. Hazards with traffic just to pull out of driveway. Also detrimental to small businesses. I am horrified by the thought of this congestion in my neighborhood." (*Jo Ann Madigan, Resident*)

"I do not like lots of traffic and big stores around because me and my brother like to ride bikes."
(*Max and Ben Malakoff, Residents*)

"Because I sit up there and watch the traffic go by; watch trucks go by; and we are already having a traffic problem. It is already pushing over, particularly during morning and evening commutes onto the side streets. Even I use the side streets. You know, when I take the 24 bus I get off across from my house, and I have trouble getting across the street now. Because there's no stop; at this point there's no stop signs from all the way from Bayshore up to Folsom, so cars go pretty fast and reach a curve. So when I go across there, I move fast and looking both ways. It is not going to get any better if you start adding more cars. But the report says that there's going to be big traffic problems."
(*Ingrid Mardeson, Resident*)

"Bayshore Boulevard already is congested when U.S. 101 and I-280 become backed up. This happens every morning and evening, and for large portions of the weekend days, and other unpredictable times. Cars already cut through Bernal Heights to avoid the traffic backups. We have narrow streets, many with two-way stops. The integrity of our neighborhood will be lost because industrial zoning begins at our doorstep. Drivers looking to 'save time' do not look out for children, seniors, or other residents. Our main shopping street is Cortland Avenue. This street will become a danger to cross.

"I drive to/from the CalTrain station (22nd Street) using Cortland and Bayshore. It can already become backed up easily because of traffic, one or two slow cars, Muni losing its power, etc. The idea of a 500-car garage at that intersection is simply inappropriate." (*Eugenie Marek, Resident*)

"I am most concerned about the traffic [it] will bring to the residential areas of Bernal Heights. The old Goodman's Lumber and the businesses that are currently operating along Bayshore is one thing, but the increase in traffic Home Depot would bring is quite another. I've seen how traffic is backed up on State Highway 280 as a result of the Home Depot in Colma, and the project proposed for our area would be even more impacted. I firmly believe the quality of life in the Bernal Heights neighborhood would be diminished by the added traffic in the area if Home Depot is allowed to move in." (*Dale Martin, Resident*)

"The traffic report indicates that, in the future, most intersections will be rated as an F. This is unacceptable.

"I am concerned that Bayshore will become like Emeryville. Emeryville is a planning disaster located near merging freeways, and traffic is always an issue. The difference between Emeryville and Bayshore is that there is a nearby neighborhood that will be impacted too." (*Amy C. Miller and Virginia Bowen, Residents*)

"The traffic alone on Gates Street – I live half a block off Cortland; it is a fun street, where I've got to go across to get to my neighborhood grocery store – which I use all the time. There is only one crosswalk; there is no room for a stop sign. And you cannot cross that street there right now. I'm not talking about with Home Depot in there.

"I cross down on the bottom of Bayshore every morning going to work, and it is already backed up."
(*Bill Nieto, Resident, oral testimony*)

"And there's the traffic at the intersection of 101 and 280, also on Cortland." (*Bill Nieto, Resident, written comments*)

"There will be too much traffic." (*Chava Nieto, Resident*)

"It would create too much traffic." (*Patrick J. O'Brien, Resident*)

"The possible delay to buses is problematic." (*Jo Ann Ogden, Resident*)

"At the very least, this project needs to be scaled down. It's not as if the site will be empty for long in any case. I'm not objecting to a large store there, just to this particular plan. It's about the worst thing possible for my neighborhood. Lots of traffic, the worst kind of traffic (diesel and pickups), the worst time for peak traffic, and very little likelihood for either a good store or good jobs coming from it." (*Chris Pagels, Resident*)

"Traffic, traffic, traffic. Exits off 101 onto Bayshore are bad now. They'll be worse. Traffic pollution." (*Barbara Paley, Resident*)

"I don't want it because it will cause too much traffic problems, which I already have problems with." (*Gilda Serrano, Resident*)

"Traffic nightmares would ruin the Bernal Heights community, and the congestion would be a fiasco. It can't happen." (*Dan Sobel, Resident*)

"I am concerned about the ... traffic on Cortland, and Mission and Bayshore." (*Paula Young, Resident*)

"The traffic impact of our already congested neighborhood is too much. My concern of the environmental issue, more cars, more smog, less enjoyment of walking in our neighborhood." (*David Ziegler, Resident*)

Response #113

The transportation analysis of the proposed project included an assessment of traffic impacts on nearby intersections, regional freeway facilities, and local streets most likely to be impacted by vehicular travel to and from the project site. The traffic impact analysis included analysis of 14 intersections in the vicinity of the project, including four intersections along Cortland Avenue (Bayshore/Cortland, Mission/Cortland, Cortland/Andover, and Cortland/Folsom). However, the DEIR does not identify impacts at the intersection of Mission/30th, as suggested by a commenter, since this intersection was not part of the traffic analysis.

The results of the traffic analysis for Existing plus Project and 2015 Cumulative conditions were used in assessing the impacts of the proposed project on air quality. The discussion of impacts on air quality is presented in the DEIR on pages 81 through 92. For further

discussion of air quality, also refer to the Air Quality section of this chapter. As summarized in the DEIR on page 8, air quality impacts of the project would be less than significant for stationary source emissions, CO concentrations and toxic air contaminants. As concluded on page 92 of the DEIR, the project would exceed the BAAQMD threshold of significance for regional air quality.

See also Responses to Comments #63 and #67 through #70 regarding pedestrian safety, parking, and the roadway configuration of Cortland Avenue and side streets in Bernal Heights.

The City of Emeryville is unique for its recently constructed IKEA store. Please refer to Response to Comment #83 for discussion of the store and surrounding traffic patterns.

The impact of the project on noise levels was reviewed in the Initial Study for the project. Based on the occupancy of the proposed project, the Planning Department determined that the proposed project would not have a significant impact due to noise (see DEIR Appendix A: Initial Study, pages A-14 and A-15). The impact of the proposed project on noise levels is further discussed in Response to Comment #127.

Comment #114

"I am speaking for Doris Vincent. This is her speech. I have lived 43 years in the Bayview. I support and approve the DEIR as written, and would – and please ask you to approve and certify the DEIR. The independent study states that 'The potential queues that would develop at the main access routes to the proposed project, and the increase in traffic volumes at the nearby intersections, would not adversely affect Muni and SamTrans service levels, and therefore would not result in significant impact to transit operations.' With the emphasis on public transit coming from the Planning Department, but the decrease in Muni services throughout the city, we concur that a level of service would not be adversely affected. Please approve and certify the DEIR." (*Judy Berkowitz, Resident*)

"I have been there for a long time, and from Goodman's in its heyday, and when Whole Earth Access and Allstate Plywood were very successful, there was quite a bit of traffic. I'm sure the traffic will be coming back to those patterns, but I think it will be better because I think there is better planning now than they had in the past. Also, we welcome the additional traffic; the consumers that will be coming to Bayshore Boulevard to shop for building materials. Because the bulk of the people – bulk of the businesses on Bayshore Boulevard do provide building materials to the public." (*Rob Caldwell, Business Owner*)

"The traffic is estimated to increase on a quarterly basis by 13 percent. That amounts to one car for every eight cars that come down there now; they are going to have one more car: not very much of an impact. Also, now that Goodman's is gone, and the Whole Earth is gone, the traffic has diminished greatly in the last three years, but we really need the Home Depot; you guys need the money; need the tax dollars. I don't want to give it to Colma; I want to give it to San Francisco." (*John DeGarmo*)

"It is my understanding that the Home Depot has redesigned their entrances and exits to be on Loomis Street – which is actually behind Bayshore Boulevard. I have enough experience with traffic engineering that I know that if they put cut-outs – even double cut-outs – that people would not get backed up on Bayshore or Industrial. You have Alemany as a main source of entry into that area. You have Bayshore Boulevard itself, and you have Highway 101 with the Bayshore exit. As several other speakers have said, I don't think people would drive down Cortland more than once. I have lived in that same house for 25 years, and I know exactly how traffic works in that area. I used to shop at Goodman's as well. I have been in that house for 25 years. Goodman's was a great shop. You know, it was very convenient; now Colma gets all of my money, and Colma gets my sales tax dollars. I believe that the traffic issues are workable – speaking directly to the EIR matters here." (*Robert Heacock, Resident*)

"We're a neighborhood improvement group for the community that is immediately south and adjacent to the proposed Home Depot site. As such, we took a careful look at this project, because we are in close proximity, and we have, for your reference, three freeway off ramps which will lead to this project site, that empty directly into our community, and through our commercial corridor of San Bruno Avenue. So as such, we were concerned initially of very much the same concern that had been aired by the Bernal Heights community, regarding traffic and impact on our commercial enterprises' viability. However, we have come to the opposite conclusion. We feel that the accommodations designed into the proposal for traffic and parking are more than adequate. We do not fear that this is going to have an adverse impact upon our commercial strip. And in fact, we're looking forward to some spill-off, as far as bringing customer flow to the area there. So we wanted to provide you with some detailed comments here; I'll submit this to your clerk (indicating). But we're in agreement with our neighbors in Bayview that this project should go forward." (*Dwayne Jusino, Resident*)

"Home Depot. It should be there. I have been there a long time, over 30 years. And I know when Goodman Lumber was there, there was no problem with traffic, because I think when somebody leaves something, they don't owe him that same trouble. So the traffic would be like – not be a big impact there – the same as you heard from other speakers. So I think it would be for the good of the neighborhood to have this business over there." (*Cesar Mendoza, Resident*)

"I'm a long-time resident of Bernal Heights, and I favor Home Depot going on to Bayshore. I'll try to stick to the EIR. I did read it – and it is not the easiest thing to do – and I did see that the traffic impact was going to increase 13 percent. And I was thinking 'Well, what about common sense?' If you've got 101, 280, and Cesar Chavez to get to the store, why would you use Cortland? If you did use Cortland, like other people have said, you would use it once. You've got eight or ten stop signs; it is a one-lane road. You will do it once, and you won't do it again.

"And also, when Goodman's and Whole Earth Access were there, they had super sidewalk sales all the time. And I mean there were cars; there were a lot of people there, and nobody ever complained in the Bernal Heights community about the traffic. And there was a lot of traffic, but nobody said anything. And also you had Whole Earth Access. I mean there was a lot of business going on. And

as far as – like the Bernal Heights Neighborhood Center, which is spearheading this whole anti-Home Depot thing – in the beginning they proposed to Home Depot, 'Well, you build your store; let us put affordable housing on top.' And there were figures like a thousand affordable units. Never a word about the problem of Cortland Avenue being inundated with traffic – only until it was declared an industrial zone. Bernal Heights Neighborhood Center turned right around and said 'No, we don't want it.' If there was affordable housing going upstairs, you would see a very quiet Bernal Heights Neighborhood Center." (*Joe Pecoro, Resident*)

"For my 14 years here I have been working here and been an avid do-it-yourselfer, often to the benefit of landlords, and often for the benefit of myself and my neighbors. I know one of the biggest issues raised in the EIR is traffic, and I think the location that has been selected is probably the best location in the city for dealing with traffic. We have 101 and 280, both literally within a stone's throw of the site. We have Industrial, Alemany, San Bruno, Bayshore and Potrero – all accessible for surface streets of various areas of the city. I know that for me, I would often walk to the Home Depot, rather than driving to Colma for any smaller lumber that I would have previously walked to Goodman's for. I currently walk to S and C Ford from my home when I need to use their services." (*Rick Rutledge, Resident*)

"The nature of my business (dictates that) I go out to people's homes all over San Francisco. I can't remember the last time I drove on Cortland Avenue, except to get a pizza, or there is a nice Hungarian restaurant up there. I don't drive through there. This is not a convenient place to get from one place to another through Cortland Avenue, and I agree that no one will make that mistake more than once. With the Home Depot in Colma, if there was a traffic hell going on in Bayshore Boulevard, I think that people might just choose to go to Colma, so I don't think it is a real concern that there's going to be, you know, people lining up for a half an hour to get through Cortland Avenue. It just wouldn't happen. The reality is when you talk about traffic and gases, there may be a little more traffic on Bayshore Boulevard because, you know, we don't have any business occupying those sites. And when I moved in there 20 years ago – 18 by the way, Whole Earth Access, not a retail clothing store at that time – it was what: Allstate Plywood Company? Next to it you have a Smart and Final – was also Pacific Supply – building supply. You are talking about the same use in a place that's been there for years and years. You have a whole street of home improvement stores and contractors. Many of the clients who would go to Home Depot – and I shop at Home Depot almost every day – they are already on Bayshore Boulevard. You are not talking about extra trips. And where do you think the people that maintain the property in San Francisco have to drive to? They are driving all the way through the city. If you shorten trips, you have less pollution. And I don't think a whole lot of people take buses to the Home Depot in Colma for their job. But I'm guessing that a lot of people who worked at Home Depot, if it were on Bayshore Boulevard, would ride a bus there – not the customers, because you can't carry 2 x 4's on the bus – but if you are talking about employees that would be accessible to them by bus; you are talking about shorter trips." (*Steve St. Denny, Business Owner*)

Response #114

These comments express support for the project and do not address the adequacy and accuracy of the DEIR. The comments are noted.

AIR QUALITY

Comment #115

"Page 82 [of the DEIR]: The air quality analysis needs to evaluate PM_{2.5} as well as PM₁₀." (*Eve Bach, Arc Ecology Consultant; Barbara Kyle, Resident/No Depot Committee Chair; and Ron Morgan, Bernal Heights Neighborhood Center Community Organizing Coordinator*)

"Air quality issues as identified by Dr. Gina Solomon should be discussed further." (*Shelley Bradford Bell, Planning Commission President*)

"We would need to have on page 85 current permissible exposure levels." (*Kevin Hughes, Planning Commissioner*)

"The report does not address the obviously foreseeable air quality impacts. The report does not address the significance of traffic-related pollution to increasing ambient concentrations of particulate matter. Particulate matter is an important health concern.

"Particulate matter refers to particles in the air. Particulate matter can be measured in various sizes. For many years, PM has been measured as particles that are 10 microns in size or smaller, known as PM₁₀. There are both short-term (1-day) and long-term (1 year) air quality standards for PM₁₀. The highest average value for PM₁₀ over the last 6 years in the Bay Area was at the monitoring station at Arkansas Street.

"It is not correct to say that the PM standards allow for any margin of safety for the exposed population. Effects of exposure to PM have been demonstrated at concentrations below the current standards, and many scientists believe there is no safe level of exposure.

"The State of California has recently adopted new, more stringent standards for PM₁₀, as part of its overall review of environmental standards to ensure that they are protective for children. This is a key policy concern because most environmental standards have been set without any consideration of the special vulnerabilities of children, either due to the greater intake of some kinds of pollutants or due to the greater vulnerability to some kinds of pollutants. Cal-EPA identified particulate matter as one of several standards deserving of early attention because many of the health effects are seen particularly in children (as well as in elderly people and those with existing respiratory disease).

"As a result of this review, ARB adopted a 1-year standard for PM₁₀, reducing the existing standard of 30 to 20 µg/m³, measured as an annual mean.¹ Both San Francisco's median and mean values exceed this standard, which means that there are significant health concerns for particulate matter today.

"Both the State and federal governments are also implementing standards that refer to even smaller particles. These standards apply to particles that are 2.5 microns in diameter or smaller, which are now as PM_{2.5}. Such smaller particles penetrate even further into the lung, and some scientists believe that the most harmful fraction of particulate matter will ultimately prove to be this smaller fraction. The DEIR does not address this issue at all." (*Amy D. Kyle, Ph.D., M.P.H., Resident*)

"There was a lady earlier talking about the air pollution. I think she knows pretty much what she's talking about, and I think the air pollution issue should be addressed and updated. I think there's

issues with what she talked about – the PM₁₀s; some of the State regulatory agencies going to 2.5, and I think that means the size of the dust particles that you would get from diesel." (*Bill Lee, Planning Commissioner*)

"I have lived in San Francisco for about 30 years, and I overlook – I'm about six, seven blocks up from Bayshore. And so I know that particulate matter accumulates on the front of my house, and I have looked at this report and I don't believe it." (*Ingrid Mardeson, Resident*)

"The report only looks at PM₁₀, but should also look at PM_{2.5} which is very dangerous size particles." (*Amy C. Miller and Virginia Bowen, Residents*)

"I think there's a type of air particulates that go into air that were not studied in this EIR. The PM_{2.5}'s are more dangerous than the PM₁₀'s – this is something that was not studied, and something I heard from an expert in this. So would like to see more study in that; more study on cancer effects of the air pollution that's going to be added to our neighborhood. But I think saying that the air pollution that's being added to our neighborhood is not significant: I also disagree with that. I believe it would be very significant." (*Gretchen Mokry, Resident*)

"I am a physician with training in internal medicine, occupational and environmental medicine, and public health. I have expertise in the fields of air quality and the health effects of air pollutants, including ozone, particulate matter, diesel exhaust, and NO_x. I am an Assistant Clinical Professor of Medicine in the Division of Occupational and Environmental Medicine at the University of California at San Francisco, and an Attending Specialist at the U.C. Pediatric Environmental Health Specialty Unit. I am also a Senior Scientist at the Natural Resources Defense Council.

"I have reviewed the Draft EIR for the proposed Home Depot at 491 Bayshore Boulevard and have serious concerns about the quality of the EIR and about its conclusions. I am writing to strongly urge the Planning Commission to reject this proposed project in its current form.

"The proposed project will significantly increase regional ozone pollution in a non-attainment area. If this project were approved, it would significantly increase ozone levels in the region. According to the EIR, the increased automobile and truck traffic associated with Home Depot would spew hundreds of pounds of air pollutants into the air throughout the Bernal Heights neighborhood. The EIR found that the project would be responsible for an estimated 84.5 pounds per day of reactive organic gases (ROG). This means that the project would have a 'significant unmitigable impact' on air quality. Reactive organic gases are precursors of ozone smog. Ozone has been shown to trigger asthma attacks in susceptible individuals, and recent studies in Los Angeles indicate that ozone can cause asthma in children who play outdoor sports (see discussion of asthma below). In addition, the Bay Area is an ozone non-attainment area [Federal Register: July 10, 1998 (Volume 63, Number 132)], so projects such as this, which create significant unmitigable impacts on air quality by increasing emissions of ozone precursors must be viewed with particular suspicion.

"The EIR fails to adequately address the project's emissions of particulate air pollution. Although Home Depot's contribution of sooty particles to the local air falls below the 'level of significance' in the EIR, the document fails to take into account the new standards related to this pollutant. On June 20, 2002, the California Air Resources Board lowered the allowable level of respirable particulate matter (PM₁₀) in the air from 30 to 20 micrograms per cubic meter (annual average).² San Francisco already exceeds this level. The Bay Area Air Quality Management District has not yet revised their guidelines (written in December of 1999) to account for the new State standard. Following the outdated BAAQMD guidelines for these particles (as was done in this EIR) will ensure that San

Francisco continues to fail to meet the State standard. Also in June of 2002, the Air Resources Board set a new standard for fine particulate matter (PM_{2.5}) at 12 micrograms per cubic meter.³ This standard reflects the science showing that the smallest particles are the most hazardous to human health. The EIR fails to address PM_{2.5} from the proposed project at all. Therefore, the impact of the proposed Home Depot project on local particulate air pollution is significant because it 'contributes substantially to an existing or projected air quality violation.' (CEQA Guidelines, Appendix G).

"Particulate matter is known to increase emergency room visits for cardiac and respiratory disease, increase rates of myocardial infarction (heart attack), and contribute to premature death. In addition, diesel particles have been linked to asthma. More than 98 percent of the particles emitted from diesel engines and cars are fine particles, less than 1 micron in diameter, which can bypass respiratory defense mechanisms and penetrate deep into the lungs.⁴ Numerous studies have found that fine particles impair lung function, aggravate respiratory illnesses such as bronchitis and emphysema, and are associated with premature death.⁵ Also, dozens of studies link airborne fine-particle concentrations to increased hospital admissions for respiratory diseases, chronic obstructive lung disease, pneumonia, and heart disease, including an increased risk of acute myocardial infarction.⁶" (*Gina M. Solomon, M.D., M.P.H., written comments*)

"In addition, when I hit page 85 of the EIR, I'm surprised at Table 8; it is quite out of date. It includes the old standard for particulate matter, 10 microns in diameter and temp of 30. That is no longer the case and has not been the case for a year. It is now lowered to 20. There is a standard for PM_{2.5} in the State of California promulgated by the ERB in June of 2002; that is a standard of 12 – not even reflected there on page 85." (*Gina M. Solomon, M.D., M.P.H., oral testimony*)

¹ California Air Resources Board. Review of the ambient air quality standards for particulate matter and sulfates. June 20, 2002 Board meeting. <http://www.arb.ca.gov/research/aaqs/std-rs/bdsum620/bdsum620.htm>.

² <http://www.arb.ca.gov/board/ms/ms062002.pdf>.

³ Ibid.

⁴ Cuddihy R.G., Griffith W.C., McClellan R.O.: Health risks from light-duty diesel vehicles. *Environ Sci Technol* 18:14a-21a, 1984.

⁵ Pope C.A.: Particulate air pollution as a predictor of mortality in a prospective study of U.S. adults. *Am. J. Respir. Crit. Care Med* 151:669-674, 1995.

⁶ Peters A., Dockery D.W., Muller J.E., Mittleman M.A. Increased particulate air pollution and the triggering of myocardial infarction. *Circulation* 103:2810-2815, 2001.

"The EIR also fails to adequately address the emissions of particulate matter (PM), not taking into account the new standards related to this pollutant. The California Air Resources Board has lowered the acceptable level from PM₁₀ to PM_{2.5}. The Bay Area Air Quality Management District has not yet revised their guidelines, but, obviously, will need to do so. San Francisco already exceeds this level. And, more importantly, particulate matter has been directly linked to asthma, contributing to the astonishing increase in the disease." (*Linda Weiner, Resident, Director of Air Quality Advocacy for the American Lung Association*)

Response #115**Standards and Thresholds of Significance**

The DEIR utilized the Bay Area Air Quality Management District (BAAQMD) *California Environmental Quality Act (CEQA) Guidelines* as a primary reference. The BAAQMD is the agency primarily responsible for assuring that national and State ambient air quality standards are attained and maintained in the San Francisco Bay Area. The Guidelines explain the BAAQMD-recommended procedures during the environmental review process under CEQA. The *CEQA Guidelines* establish thresholds of significance and provide direction on how to evaluate potential air quality impacts, assist lead agencies in determining whether a project may have a significant air quality impact, and how to mitigate these impacts. Ambient air quality standards are outdoor air concentrations below which no significantly adverse health effects are expected. Emission standards are the maximum amount of pollution that is permitted to be discharged from a polluting source measured over time – for example, the number of pounds of dust that may be emitted per hour from an industrial process.

The BAAQMD's thresholds of significance are based on the State Office of Planning and Research definitions of significant environmental effect. Section 15382 of the *CEQA Guidelines* defines "significant effect on the environment" as a "substantial, or potentially substantial, adverse change in any of the physical conditions within the area affected by the project including... air."

The DEIR found that the proposed project would have a significant impact on ozone air quality based on total indirect emissions exceeding the BAAQMD's 80-pound-per-day threshold for the ozone precursors Reactive Organic Gases (ROG). The threshold for this pollutant is equivalent to the BAAQMD offset requirement thresholds for stationary sources in the District rules and regulations and are not based on any level of air quality deterioration. Because of the regional and cumulative nature of ozone, any ozone air quality effects would not occur locally, but elsewhere within the air basin.

Particulate Matter (PM₁₀ and PM_{2.5})

The DEIR addressed particulate matter emissions from both project construction and operation. Suspended particulate matter (PM) is a complex mixture of tiny particles that

consists of dry solid fragments, solid cores with liquid coatings, and small droplets of liquid. These particles vary greatly in shape, size and chemical composition, and can be made up of many different materials such as metals, soot, soil, and dust. "Inhalable" PM consists of particles less than 10 microns in diameter, and is defined as "suspended particulate matter" or "PM₁₀." Fine particles are less than 2.5 microns in diameter (PM_{2.5}). PM_{2.5}, by definition, is included with PM₁₀.

The project was found to have a potentially significant impact due to particulate emissions during construction that could be mitigated by dust control measures. Project operation would not be a stationary source of particulate matter emissions. The project would indirectly generate particulate emissions through vehicle-trips. The DEIR quantified operational emissions of PM₁₀ from vehicular sources, which includes, by definition, emissions of PM_{2.5}. The DEIR analysis was conducted according to the BAAQMD CEQA *Guidelines*, expressed in pounds per day. The guidelines require quantification of total indirect emissions of PM₁₀, and comparison of this threshold to the total indirect emissions of a project. The BAAQMD significance threshold is a mass emission threshold expressed in pounds per day. The total emission from all vehicles is the sum of emissions from all trips to or from the site, regardless of location of the vehicle. In fact, very little of the emissions calculated would occur in proximity to the actual site, but would be dispersed over a large area around the site along streets and highways used by project patrons and employees.

Diesel particulates associated with the project represent the greatest risk to the health of the surrounding community, nearby sensitive receptors, and the Bay Area Air Basin as a whole, 97 percent of which is classified as PM_{2.5}. The DEIR included a screening health risk assessment for diesel particulate for worst-case locations where exposure would be greatest. Exposure at identified sensitive receptors would be less than the exposure calculated for worst-case locations. Using the BAAQMD thresholds of significance for toxic air contaminants, this analysis showed a less-than-significant impact, both for cancer risks and for non-cancer health effects from long-term chronic exposure (diesel particulate is not considered to have short term (acute) non-cancer health effects).

Neither particulate matter (PM₁₀ or PM_{2.5}) shows a strong correlation to local traffic, but each one tends to relate to more regional pollutants like ozone, where concentrations are

dependent on wind, weather, and atmospheric reactions rather than proximity to a particular roadway. Particulate matter may have localized effects in addition to regional effects; however, there are no quantitative methods or models that have been developed to precisely estimate local concentrations of particulate matter from roadways as has been done for local pollutants such as carbon monoxide (CO). Particulate matter impacts are addressed on a regional basis, as is the case for ozone precursors.

Particulate Matter Air Quality Standards

Air pollutants that exceed the ambient air quality standards (outside air concentrations below which no health effects occur) such as particulate matter (PM₁₀ and PM_{2.5}) and ozone have been shown to be correlated with numerous health effects. Certain populations are at greater risk from the potential effects of particulate matter such as the elderly, children, and people with asthma and other breathing problems. Such relationships between particulate matter and health effects, however, are based on ambient air quality measurements rather than emissions (amounts of pollutants measured over time regardless of location), so the standards do not establish relationships that would allow quantified analysis of health effects from an indirect source of pollution. It is not currently possible to determine particulate matter or ozone concentrations that would result from an indirect source such as the proposed project. Therefore, the BAAQMD has established mass-emissions thresholds of significance for particulate matter similar to that for ozone precursors. This approach was utilized in the DEIR. Regional air quality impacts were found to be significant. According to the BAAQMD CEQA *Guidelines*, any project that has an individually significant impact would also have a significant cumulative impact.

The State of California regularly reviews scientific literature regarding the health effects of exposure to PM and other pollutants. On May 3, 2002, the California Air Resources Board (CARB) staff recommended lowering the level of the annual standard for PM₁₀ and establishing a new annual standard for PM_{2.5} (particulate matter 2.5 micrometers in diameter and smaller). The new standards became effective on July 5, 2003. The current state and federal ambient air quality standards are shown in Table C&R.18 on the following page. All of the other standards remain the same as those in the DEIR. The designations for the new federal 8-hour ozone standard and PM_{2.5} standards are pending.

**Table C&R.18
Federal and State Ambient Air Quality Standards**

Pollutant	Averaging Time	Federal Primary Standard	State Standard
Ozone	1-Hour 8-Hour	0.12 PPM 0.08 PPM	0.09 PPM N/A
Carbon Monoxide (CO)	1-Hour 8-Hour	35.0 PPM 9.0 PPM	20.0 PPM 9.0 PPM
Nitrogen Dioxide (NO ₂)	Annual Average 1-Hour	0.05 PPM N/A-	N/A 0.25 PPM
Sulfur Dioxide (SO ₂)	Annual Average 1-Hour 24-Hour	0.03 PPM N/A 0.14 PPM	N/A 0.25 PPM 0.04 PPM
PM ₁₀	Annual Average 24-Hour	50 µg/m ³ 150 µg/m ³	20 µg/m ³ 50 µg/m ³
PM _{2.5}	Annual 24-Hour	15 µg/m ³ 65 µg/m ³	12 µg/m ³ N/A
Lead	Calendar Quarter 30 Day Average	1.5 µg/m ³ N/A	N/A 1.5 µg/m ³
Sulfates	24 Hour	25 µg/m ³	N/A
Hydrogen Sulfide	1-Hour	0.03 PPM	N/A
Vinyl Chloride	24-Hour	0.01 PPM	N/A

Source: California Air Resources Board, Ambient Air Quality Standards, July 9, 2003.
(<http://www.arb.ca.gov/aqs/aaqs2.pdf>)

Notes:

N/A = Information not applicable or does not exist

PPM = Parts per Million

µg/m³ = Micrograms per Cubic Meter

State Ambient Air Quality Standards for ozone, carbon monoxide, sulfur dioxide (1-hour and 24-hour), nitrogen dioxide, and inhalable particulate matter are values that are not to be exceeded. All other state standards shown are values not to be equaled or exceeded.

National Ambient Air Quality Standards, other than ozone and those based on annual averages, are not to be exceeded more than once a year. The ozone standard is attained when the fourth highest eight hour concentration in a year, averaged over three years, is equal to or less than the standard. For PM₁₀, the 24 hour standard is attained when the expected number of days per calendar year with a 24-hour average concentration above 150 µg/m³ is equal to or less than one. For PM_{2.5}, the 24-hour standard is attained when 98 percent of the daily concentrations, averaged over three years, are equal to or less than the standard.

Attainment Status

The CARB and U.S. Environmental Protection Agency (USEPA) have designated the Bay Area as nonattainment for the 8-hour ozone standard, and as unclassifiable attainment for the federal PM_{2.5} standards.

While adoption of a new 8-hour federal ozone standard will require preparation of a new attainment plan for this pollutant, the adoption of the new federal/state standards for PM_{2.5} and revisions to the state PM₁₀ standard would not result in new attainment planning efforts. The Bay Area is an attainment area for the federal particulate matter standards, and state standard nonattainment areas for PM₁₀ or PM_{2.5} are not required to prepare attainment plans under the California Clean Air Act of 1988.

The ambient air quality standards are concentrations rather than mass emission thresholds; their modification would only affect stationary sources of pollutants that are subject to concentration limits as well as mass emission limits. The use of a mass emission threshold for regional pollutants such as ozone and particulate matter is appropriate because, for an indirect source (something that attracts vehicle-trips from a large area), no individual project could cause a violation of a standard. The BAAQMD threshold of significance for PM₁₀ of 80 pounds per day is equivalent to the District's definition of a major modification to a major facility (Regulation 2-2-221), which is not directly related to the ambient air quality standards.

The thresholds for ROG and NO_x (ozone precursors) are equivalent to the District offset requirement (15 tons per year) for stationary sources, and are likewise not based on exceedance of any ambient air quality standard.

PM_{2.5}

The BAAQMD thresholds provide the definition of an emission that "contributes substantially to an existing or projected air quality violation." Project emissions of PM₁₀ are substantially below this threshold, so project impacts on particulate matter were determined to be less than significant. Emissions of PM_{2.5} were not calculated separately due to the inability of current emission forecasting tools to differentiate PM_{2.5} from PM₁₀ and because

the BAAQMD Guidelines have no $PM_{2.5}$ mass emission thresholds that could be utilized to assess the significance of $PM_{2.5}$ emissions separate from PM_{10} . Both the State of California and USEPA are currently developing methods and techniques to address $PM_{2.5}$ emissions, but the body of knowledge regarding emission factors for this pollutant is not as extensive as that used for PM_{10} . The URBEMIS computer program used to forecast emissions from the project and used statewide for the analysis of project impacts does not differentiate $PM_{2.5}$ separate from PM_{10} .

It is known that, as a subset of PM_{10} , $PM_{2.5}$ emissions would necessarily be less than that for PM_{10} . Based on the fraction of PM_{10} and $PM_{2.5}$ for particulate matter speciation profiles contained in the California Emission Inventory and Reporting System (CEIDARS) for paved-road dust (the primary source of particulate emissions for an indirect source), $PM_{2.5}$ emissions would be roughly 16.9 percent of PM_{10} emissions, which would be 6.1 pounds per day.⁴⁶

Table C&R.19 on the following page updates the information in Table 8 on page 85 of the DEIR. It includes information on data from 2002 and includes levels of $PM_{2.5}$ with respect to the air quality standards in effect at the time. Subsequent standard changes are noted in the footnotes. This additional year's data does not result in changes to the DEIR analysis of impacts or conclusions.

The DEIR is revised so the first sentence in the last paragraph on page 81 regarding ambient air quality standards incorporating "an adequate margin of safety" is changed. The sentence now reads: "The ambient air quality standards are intended to protect public health and welfare, ~~and they incorporate an adequate margin of safety.~~"

⁴⁶ California Air Resources Board, *California Emission Inventory and Reporting System (CEIDARS)*, 2003. BAAQMD's threshold for significant impacts of PM_{10} is 80 pounds per day.

Table C&R.19 (Revised EIR Table 8)
San Francisco Air Pollutant Summary, 1998-2002

Pollutant	Standard	Monitoring Data by Year ¹			
		1999	2000	2001	2002
Ozone					
Highest 1-hr average, ppm	0.09 ²	0.08	0.06	0.06	0.04
Number of standard excesses		0	0	0	0
Highest 8-hr average, ppm	0.08	0.08	0.05	0.05	0.05
Number of standard excesses		0	0	0	0
Carbon Monoxide					
Highest 8-hr average, ppm	9.0 ²	4.2	3.2	3.3	2.6
Number of standard excesses		0	0	0	0
Nitrogen Dioxide					
Highest 1-hr average, ppm	0.25 ²	0.10	0.07	0.07	0.08
Number of standard excesses		0	0	0	0
Sulfur Dioxide					
Highest 1-hr average, ppm	0.05 ²	0.007	0.005	0.007	0.006
Number of standard excesses		0	0	0	0
Particulate Matter (PM₁₀)					
Highest 24-hr average, µg/m ³	50 ²	78	53	67	74
Number of standard excesses		6	2	7	2
Annual Geometric Mean, µg/m ³	30 ²	22.7	21.7	22.9	18.7
Particulate Matter (PM_{2.5})					
Highest 24-hr average, µg/m ³	65	47.9	76.6	70	n/a
Number of standard excesses		0	2	4	
Annual Geometric Mean, µg/m ³	15 ⁴	11.4	11.5	13.1	

Source: California Air Resources Board, Aerometric Data Analysis & Management (ADAM), 2003; and Bay Area Air Quality Management District, Bay Area Air Pollution Summary, 1999-2002.

Notes:

ppm = parts per million; µg/m³ = micrograms per cubic meter.

n/a = Not applicable or does not exist.

¹ All data were collected at the Arkansas Street Station.

² State standard, not to be exceeded.

³ State standard was revised downward to 20 µg/m³ effective July 5, 2003.

⁴ State of California adopted a more stringent annual average standard of 12 µg/m³ which became effective July 5, 2003. Therefore, there were no exceedances in 1999 and 2000.

Comment #116

"The report does not address the significance of traffic-related pollution to increasing ambient concentrations of several hazardous air pollutants. The only hazardous air pollutant that the DEIR even mentions is diesel exhaust. There are many others that are directly associated with traffic-related emissions including benzene, formaldehyde, and acrolein. Each of these will add to the risk created by the Home Depot project. All of these should be assessed and considered together. Separating out only one of them is not a valid approach." (*Amy D. Kyle, Ph.D., M.P.H., Resident*)

"I believe that the environment report does not include all of the environmental impacts and is unacceptable. The report only looked at diesel exhaust. Other contaminants should have been looked at." (*Amy C. Miller and Virginia Bowen, Residents*)

"In addition, the reactive organic gases that are ozone precursors are, in their own right, toxic air contaminants. We're talking about volatile organic compounds like benzene formaldehyde, and a whole series of other VOCs – most of which are listed by the State of California Air Resources Board as toxic air contaminants – and yet were not addressed in the EIR. The only toxic air contaminant addressed in the EIR is exhaust particulate." (*Gina M. Solomon, M.D., M.P.H., oral testimony*)

"The EIR fails to evaluate project impacts from a host of Toxic Air Contaminants. Reactive Organic Gases are volatile chemicals that have significant toxicity in their own right. They include toxic air contaminants such as benzene, toluene, 1,3-butadiene, formaldehyde, and others. Benzene, and 1,3-butadiene are known human carcinogens. Formaldehyde is a probable carcinogen and airway irritant. Toluene is 'known to the State of California to cause birth defects or reproductive harm.'¹ Toxic air contaminants (TACs) are a variety of hazardous chemicals that are emitted by diesel and gasoline engines. The EIR fails to perform risk assessments for any of these chemicals, even though they are toxic air contaminants and should be included in the EIR." (*Gina M. Solomon, M.D., M.P.H., written comments*)

¹ Cal EPA, Office of Environmental Health Hazard Assessment, Chemicals Known to the State to Cause Cancer or Reproductive Toxicity.

Response #116

The air quality impact analysis was conducted utilizing the BAAQMD CEQA *Guidelines*. Neither these guidelines nor the District's General Risk Management Plan require or suggest that indirect sources, which the Home Depot would be, prepare analyses of risk from mobile sources. The one exception to this would be projects that generate substantial diesel truck traffic. According to Brian Bateman, BAAQMD Toxics Evaluation Section Manager, the overwhelming source of risk associated with mobile sources is from diesel particulate.⁴⁷

⁴⁷ Brian Bateman, BAAQMD Toxics Evaluation Section Manager, personal communication with Donald Ballanti, certified meteorologist and air quality consultant for the DEIR, September 11, 2003.

While diesel vehicles make up about 4 percent of the total vehicle fleet, they are responsible for about 75 percent of the total health risk associated with mobile sources.

The DEIR addressed this impact by examining worst-case exposure to project-related truck traffic accessing and using the loading docks. The loading docks were selected for modeling because it would be the focus of truck traffic and idling, and would represent the maximum exposure of persons to project-generated mobile-source toxic air contaminants (TACs).

Cars and trucks release at least forty different TACs, as noted by the commenter. The most important, in terms of health risk, are diesel particulates, benzene, formaldehyde, 1,3-butadiene, and acetaldehyde. Diesel particulates cannot be differentiated from other particulate matter. Particulate matter is a conglomerate of naturally-occurring, directly-emitted man-made, and photochemically-produced, materials suspended in the atmosphere. The mass of particles per unit volume is measurable, but there is currently no practical method of determining what portion of the particulate is attributable to diesel engine exhaust. The DEIR quantitatively projected diesel particulate concentrations and associated health risks using an air pollution model. Diesel health risks must be addressed in this manner because concentrations of diesel particulate cannot be measured or monitored.

On the other hand, benzene, formaldehyde, 1,3-butadiene, and acetaldehyde are all chemicals that can be relatively easily measured in the atmosphere, but which are not amenable to modeling. Modeling is made difficult by a variety of circumstances. The first is uncertainty about emission factors. All of these chemicals result from the combustion or evaporation of gasoline (and other processes), but it is known that there are wide variations in emission rates of each chemical from different vehicle types (diesel, gasoline), technology groups (carbureted, fuel injected, etc.) and emission control systems. Such detailed emission factors are not currently available. Even if such detailed emission factors were available, a much more detailed breakdown of vehicle ages, sizes, engine types, technology groups, etc., for a given stretch of roadway would be required than is currently available.

A second factor that makes modeling of benzene, formaldehyde, 1,3-butadiene, and acetaldehyde impractical is that they are not inert. The air quality models capable of predicting concentrations near highways were developed for "inert" pollutants such as carbon

monoxide (CO). These chemicals take part in chemical reactions and are created from other precursors in the atmosphere, so they would not be considered inert.

Two recent research efforts provide information on the relative risk from non-diesel mobile source TACs. The MATES-II (Multiple Air Toxics Exposure Study) conducted in southern California was a comprehensive survey of air toxic exposure at locations impacted by mobile source emissions. This study found that about 70 percent of all risk from TACs is attributable to diesel particulate emissions, about 20 percent was attributable to other TACs associated with mobile sources (including benzene, formaldehyde, 1,3-butadiene, and acetaldehyde). The remaining 10 percent of the risk was attributed to stationary sources.

The MATES-II study did not find evidence that mobile source toxic risk is attributable to local traffic. Risk levels ascribed to nearby sources inventoried for the study are generally much lower than region-wide risk levels. Region-wide risks tend to overwhelm any potential local 'hot spots.'⁴⁸ The MATES-II study monitored air toxics at three microscale sites specifically chosen "because of influence and proximity to major mobile sources (e.g., congested freeways)." The South Coast Air Quality Management District concluded, in part: *"No significantly higher levels of key mobile source toxics compounds, benzene and 1,3 butadiene, were found at any of the microscale sites, including those sited near freeways specifically for mobile source influences."*⁴⁹

As part of the Children's Environmental Health Protection Program, CARB performed monitoring programs in six communities around the state where children are typically present, such as schools and daycare centers, and near sources of air pollution, including busy highways and industry. At each site, approximately 40 toxic air pollutants were measured. The closest monitoring location to the project site was the Lockwood Elementary School in Oakland. This monitoring location was situated between the 580 and 880 freeways, approximately two miles southeast of an industrial area. This site was selected because it was impacted by several categories of pollutant emissions and because of the large school-age population in the area.

⁴⁸ Multiple Air Toxics Exposure Study (MATES-II), South Coast Air Quality Management District (AQMD), March 2, 2000, <http://www.aqmd.gov/matesiidf/matestoc.htm>.

⁴⁹ Ibid.

The results of the monitoring and health risk analysis at the Lockwood Elementary School were:

- Total risk from the 10 most important TACs was calculated as 676 in one million.⁵⁰ About 71 percent of the total risk was attributable to diesel particulate.
- Benzene contributed approximately 8 percent of the calculated potential cancer risk.
- Formaldehyde contributed approximately 2 percent of the calculated potential cancer risk.
- 1,3-butadiene contributed approximately 10 percent of the calculated potential cancer risk.
- Acetaldehyde contributed less than 1 percent of the calculated potential risk.

The results from the Lockwood Elementary School site are similar to those of the MATES-II study. In both cases, the largest source of cancer risk is diesel particulate, contributing roughly 70 percent of the calculated risk. Other mobile-source related TACs contribute roughly 20 percent of the calculated risk.

The above ratios are applicable to the project site as the locations are similar. Assuming the ratios are similar and using the diesel particulate cancer risk shown in DEIR, the estimated maximum total cancer risk from all mobile source TACs for the proposed project would be less than one per million for the maximally exposed individual and well below the BAAQMD threshold of significance of 10 per million. This "order of magnitude" estimate is based on the worst-case assumption that incremental risk is primarily due to diesel exhaust and that the other components of risk are due to additional project traffic on local streets. The MATES-II study described above found, however, that region-wide risks tend to overwhelm any potential local "hot spots" and that risks are not correlated with local traffic.

In sum, the DEIR concluded on page 92 that project impacts related to TACs would be well below the BAAQMD thresholds of significance and would be less-than-significant.

Comment #117

"The congestion will increase pollution vastly over what is projected in the DEIR, which assumes that cars will be moving at an average speed of 25 mph. This speed is not being attained today. The

⁵⁰ This represents the incremental probability of contracting cancer over a lifetime, based on a 70-year exposure.

DEIR needs to have traffic and air quality impacts re-examined to reflect the gridlock conditions that will exist much of the time." (*Amy D. Kyle, Ph.D., M.P.H, Resident*)

"The EIR underestimates the air quality impacts on the neighborhood. The Draft EIR fails to consider cumulative impacts, including current air quality conditions associated with traffic in the local area, and projected future air quality once Home Depot and various other businesses are all located along Bayshore Boulevard. In particular, we have been informed that other 'big box' stores are considering property along Bayshore Boulevard if the Home Depot project is approved. This 'big box alley' would result in air quality impacts far in excess of those projected in this EIR and would result in a serious cumulative impact on the neighborhood and the region. Locating a 'big box alley' in such close proximity to a residential neighborhood and a school would be a poor public policy decision and could constitute a significant health and environmental threat to the area.

"The Draft EIR seriously underestimates likely air pollution impacts from the proposed project by failing to consider three important, yet obvious, factors: First, the Draft EIR assumes that all vehicles are traveling at a constant speed of 25 miles per hour. However, the traffic study indicates that there will be primarily stop-and-go traffic at most major intersections in the neighborhood. This is because of the combination of stop signs, traffic lights, and heavy traffic projected as a result of this project. Traffic that is stopping and starting generates far higher emissions than traffic moving at a constant speed of 25 miles per hour. For example, VOC emissions rates for a 1980s car would double from about 7 g/mi to about 14 g/mi if the car is stopping and starting rather than traveling at a constant 25 mph (Figure [Refer to Appendix E of this document, Gina Solomon Letter dated July 3, 2003, Figure 1]). Carbon monoxide emissions for a similar car would increase from about 75 g/mi to about 175 g/mi. It is clear that the assumption that vehicles will travel a constant speed of 25 mph is not only patently false, but it will also seriously underestimate the impact of this project." (*Gina M. Solomon, M.D., M.P.H, written comments.*)

"There are a number of things in the EIR that underestimate. For example, there's no consideration of idling vehicles; no consideration of the fact that vehicles in stop-and-go driving generate far more carbon monoxide and volatile organic compounds than vehicles traveling at a constant speed of 25 miles an hour – which is what is assumed in the EIR, quite incorrectly." (*Gina M. Solomon, M.D., M.P.H., oral testimony*)

"The EIR clearly underestimates the air quality impacts on the neighborhood by not correctly calculating air pollution impacts from traffic. It assumes all vehicles travel at a constant 25 miles per hour, but there will be (and there is now) stop-and-go traffic from stop signs and heavy traffic, to say nothing of eventual traffic lights. In addition, vehicles coming up Bernal Hill from Mission, a steep climb, will have substantially more emissions when under a heavier load. And cars looking for parking (which happens now) often idle while looking for space, thereby emitting more pollutants. More alarming is the possibility of this site on Bayshore becoming the first of many, as has been indicated. Such close proximity to a residential neighborhood and school is frightening." (*Linda Weiner, Resident, Director of Air Quality Advocacy for the American Lung Association*)

Response #117

The URBEMIS computer program developed by the CARB calculates the emissions from all trips to or from the project site over the entire length of the trip, including idling. One of the factors considered is an estimate of average vehicle speed. That does not assume that traffic

flows at a constant speed, rather the speed during the entire trip would be quite variable. The definition of average vehicle speed is distance traveled divided by the time of travel, therefore it would include periods of idling.

URBEMIS calculates daily emissions, so the speed input reflects the average speed over the entire day over a large segment of the transportation system, and is not meant to represent local conditions. For instance, a home-to-work trip with an average trip length of 13 miles would likely include some surface street travel and some freeway travel, and only a small portion of the trip would occur within the surrounding area of the project. The BAAQMD recommends an average speed of 25 mph for calibrating potential project impacts within San Francisco County. This reflects greater assumed congestion, since the recommended average speed for Bay Area counties other than San Francisco is 35 mph. The use of 25 mph is not unreasonable given the intent of the average speed to reflect conditions averaged over the length of the trip and over the entire time of the day that the trips occur.

The 25 mph average speed was only used by the URBEMIS program to estimate total regional emissions such as ROG, NO_x, and particulate matter for the entire length of all project related trips over a 24-hour period. The analysis of CO concentrations used a BAAQMD screening procedure to predict concentrations at specific locations near surface street intersections and used emission factors based on a 5-mph average vehicle speed. These factors for CO analyses are representative of conditions near intersections during the peak hours.

The DEIR addressed the cumulative impact of the project on local and regional air quality. The CALINE-4 program was utilized to forecast worst-case concentrations of CO at affected intersections with cumulative traffic increases. According to BAAQMD significance criteria, any proposed project that would individually have a significant air quality impact would also be considered to have a significant cumulative air quality impact. Since the proposed project would exceed the BAAQMD thresholds of significance for ROG, the DEIR identified, on pages 91 and 113, that the project would have a significant cumulative impact on regional air quality.

Comment #118

"In addition, they seem to think Bernal Heights is flat. Vehicles that go up and down hills are known to generate significantly more pollution.

"A significant portion of the automobile traffic to the site is projected to come over Bernal Hill (via Cortland Avenue or smaller side streets). Emissions studies consistently demonstrate that vehicle emissions increase substantially when the engines are under higher load conditions as a result of an uphill grade. A report from the Lawrence Berkeley National Laboratory states:

"Under high speed and acceleration requirements, today's vehicles are designed to have excess fuel injected into the engine cylinder. This 'enrichment' of the air/fuel mixture leads to elevated CO and HC formation during combustion, with no oxygen available for pollutant conversion to CO₂ and water in the catalyst. The result is a temporary 'puff' of high tailpipe CO and HC emissions (Goodwin and Ross 1996). In some vehicles, fuel injection is cut off during rapid decelerations. This can lead to cylinder misfire and a temporary 'puff' of high HC emission (An et al. 1997).¹

"It is surprising that an EIR done in San Francisco should omit the important consideration of hills." (*Gina M. Solomon, M.D., M.P.H.*)

¹ Wenzel T., Singer B.C., Slott R. Some Issues in the Statistical Analysis of Vehicle Emissions. Environmental Energy Technologies Division, Lawrence Berkeley National Laboratory. <http://eetd.lbl.gov/IEP/PSDC/abstratcs/singer2.pdf>.

Response #118

Vehicles climbing hills do emit more emissions per mile than on level roads, but vehicles on the opposite side of the road going downhill emit less emissions per mile. This effect is self-canceling, and thus uphill and downhill are "reflected" in air quality modeling. This is a standard practice in California air quality modeling. As described in Response to Comment #117, the URBEMIS program tracks trips over the entire length of the trip and reflects averaged conditions over the length of the trip rather than specific parts of the trip. The effect of slope on overall emissions is quite small, thus, the URBEMIS program and CARB's EMFAC (emission factor) program (which is the basis for the URBEMIS calculations) provide no adjustment for varying slope or terrain. There is no net elevation gain or loss when considering all trips to and from an indirect source.

Comment #119

"Stalled, idling cars will release emissions and damage air quality in surrounding areas." (*Amy Beinart, Resident*)

"Traffic delays mean cars idling, with increased car exhaust pollution. Put this project somewhere where cars won't have to idle in order to arrive/leave the center." (*Eugenie Marek, Resident*)

"The EIR failed to consider the idling of cars looking for parking at busy times as described in the traffic report produced by Wilbur Smith Associates. Idling vehicles are an additional source of all of the air pollutants discussed in this EIR, yet they were not included at all in the analyses. The United States Environmental Protection Agency's Office of Mobile Sources has provided standard idling estimates for various vehicle types and weather conditions.¹ These are readily available for inclusion in an EIR to include these in the air quality impacts assessment. The emissions of hydrocarbons (VOCs) and of carbon monoxide from idling passenger cars are a serious contributor to air quality and must be included to fully capture the air quality impacts of this project." (*Gina M. Solomon, M.D., M.P.H.*)

¹ <http://www.epa.gov/otaq/consumer/f98014.pdf>.

Response #119

As noted in Responses to Comments #117 and #118, the idling of vehicles is a factor considered in the use of the URBEMIS program, which was used in the DEIR to predict project emissions of hydrocarbons (VOCs). Inherent in the assumption of an average 25 mph speed over the length of the trips averaged over time and averaged geographically is that delays would occur. Exhaust emission rates for various vehicle types are based on a standard exhaust emissions driving cycle that simulates urban driving with frequent deceleration, idling and acceleration over a distance of approximately 11 miles.⁵¹ These rates are part of the UREMBIS program.

Idling of vehicles is also inherent in the analysis of CO concentrations, which uses a BAAQMD screening procedure to predict concentrations near surface street intersections. This model uses emission factors based on a 5-mph average vehicle speed.

The project is not anticipated to increase idling within the surrounding neighborhood by vehicles looking for parking most of the time. The project includes a parking garage providing 539 spaces. As noted in Response to Comment #94, during times of peak occupancy in the garage, the project's parking supply may not be able to accommodate the entire parking demand, and vehicles would have to park on Bayshore Boulevard or Loomis

⁵¹ California Exhaust Emissions Standards and Test Procedures for 2001 and Subsequent Model Passenger Cars, Light-Duty Trucks, and Medium-Duty Vehicles, California Air Resources Board, August 5, 1999.

Street where there is currently on-street parking available. On those occasions, idling of cars could increase, but it would not be significant.

Comment #120

"The report does not consider the effects of increased air pollution on vulnerable populations. In general, we know from epidemiology studies that children and the elderly are groups at greater risk of harm from exposure to most air pollutants. We also know that people with existing respiratory diseases are at greater risk. Such populations should be of concern in any attempt to address air quality.

"The report does not even pretend to address the contribution of this project to increased concentrations of ozone in the Bay Area. The DEIR acknowledges this as an impact of the project. It should be addressed. Increased air quality impacts are not acceptable, and the City needs to be working on reducing air pollution, not increasing it.

"Ozone is one of the six 'criteria' pollutants. It is a significant health concern because it is known to alter lung function and contribute to respiratory disease. There are more violations of ozone standards than those for any other criteria air pollutant in the U.S. The Bay Area Air Quality Management District has been designated as being in 'non-attainment' status for ozone. This means that it is considered to be out of compliance with the National Ambient Air Quality Standards, and that the State and the Air District are supposed to take steps to attain compliance. Allowing unmitigated increases in releases of gases that contribute to ozone formation is not acceptable. Motor vehicles are the most significant source of the chemicals that lead to formation of ozone (ozone precursors) in the Bay Area. In 2000, EPA reports that the Bay Area exceeded the federal ozone standard on 3 days. In 1999, there were also 3 exceedance days. In 1998, there were 8 days."¹
(Amy D. Kyle, Ph.D., M.P.H., Resident)

¹ U.S. Environmental Protection Agency, Region 9. Fact Sheet. Notice of Proposed Rulemaking. Partial Approval/Partial Disapproval of Ozone Attainment Plan and Finding of Failure to Attain. March 12, 2001. <http://www.epa.gov/region09/air/sfbayoz/fact0103.html>.

"It says there's going to be big air problems. I have worked 27 years with pre-schoolers; I have seen a massive increase in asthma. I didn't have kids with asthma 27 years ago. I didn't have it. Now I've got kids with asthma and with inhalers at school, and I'm ready to do CPR. This is not right." (Ingrid Mardeson, Resident)

"67 pounds of NOx is too much. Remember that Home Depot is next to a neighborhood where there are schools and many elderly people live in Bernal Heights. They can suffer more from toxic air.

"The report says that it will exceed PM and ozone standards. This is unacceptable. We urge you not to allow our air to become dirtier." (Amy C. Miller and Virginia Bowen, Residents)

"And it is incredible that people think that there's not going to be any difference in pollution and stuff like that. I'm 58 years old. I go to the gym every day. I don't smoke; I don't drink; I'm in perfect health. I'll go to Colma right up the street. If something happens to me, who is going to be

responsible for this? My son and daughter? My father died from emphysema, from smoking; a terrible death. That's what I'm worried about." (*Bill Nieto, Resident*)

"I'm a senior scientist at the Natural Resources Defense Council, and an assistant professor of medicine at UC-San Francisco. I'm here tonight, however, as a resident of Bernal Heights. I read the draft EIR with great interest, with focus particularly on the air quality section, as that is my area of expertise. And I have some significant concerns. Obviously there's a threshold concern, because the EIR states quite clearly that there is a significant unmitigable impact on reactive organic gases which, as you know, are precursors to ozone. As you may also know, there is quite a body of epidemiological literature right now linking ozone with asthma, particularly in children. A major study in the past year published down in Los Angeles showed that children who play sports outdoors in areas where the ozones are high – are more likely to develop new-onset asthma. These are kids who did not have asthma when the study began, and because they were playing sports in a high-ozone area they developed asthma. We don't want to go there, and yet the Bay Area is now designated as a non-attainment area for ozone, so we are going there, and we do need to pull back from the brink." (*Gina M. Solomon, M.D., M.P.H., oral testimony*)

"Air pollution is linked to asthma. Asthma is more common in the urbanized areas of industrialized countries and is particularly common in children living along busy roads and trucking routes.¹ A population-based survey of more than 39,000 children living in Italy found that children living on streets with heavy truck traffic were 60 to 90 percent more likely to have acute and chronic respiratory symptoms such as wheeze or phlegm, and diagnoses such as bronchitis and pneumonia.² A German study of over 3,700 adolescent students found that those living on streets with 'constant' truck traffic were 71 percent more likely to report hay fever-like symptoms and more than twice as likely to report wheezing.³ Studies have also shown that the proximity of a child's school to major roads is linked to asthma, and the severity of children's asthmatic symptoms increases with proximity to truck traffic.⁴ Both nitrogen oxides and particulate matter were linked to a significant decrease in lung function growth among children living in Southern California.⁵ Although some components of outdoor air pollution are beginning to decline in the United States, ozone and fine particulate pollution (PM_{2.5}) from diesel engine exhaust are an ongoing or increasing problem.⁶

"Numerous studies have demonstrated that specific components of air pollution are associated with asthma attacks.⁷ For example, particulate air pollution has been linked to increases in emergency room visits for asthma.⁸ Nitrogen dioxide (NO₂) and sulfur dioxide are directly damaging to the respiratory system. Elevated levels of NO₂ in outdoor air are associated with exacerbations of asthma.⁹ Because these compounds are airway irritants, it is not surprising that they can trigger asthma attacks.

"Air pollutants may act in conjunction with common allergens to dramatically increase sensitivity to pollen or other common proteins. In laboratory volunteers, combined exposures to levels of ozone or NO₂ commonly found in urban air and low levels of common allergens such as pollen results in dramatically enhanced asthmatic or allergic reactions.^{10,11} One important study has shown that exposure to common urban levels of diesel exhaust can cause people to develop allergic reactions to proteins to which they did not previously react.¹² In this study, some volunteers were exposed to a concentration of diesel exhaust roughly equivalent to 1-3 days of breathing Los Angeles air prior to exposure to a new allergen. Subjects exposed to the new allergen alone did not develop antibodies to this compound, whereas subjects exposed to diesel exhaust followed by the allergen developed a full-blown allergy.

"Air pollutants such as ozone may do more than trigger attacks in people with asthma. New data suggest that ozone may actually cause asthma in previously healthy children.¹³ In a major prospective study of school age children living in Southern California, children who played outdoor sports in areas where ozone levels were high were significantly more likely to become asthmatic, compared to athletes in less smoggy areas. Because ozone smog is an increasing problem in the Bay Area, and because this proposed project is projected to create an unmitigable impact that includes increased ozone pollution, this project contributes to a significant health concern for children living in San Francisco.

"For all of the reasons stated above, I strongly urge you to reject the proposed Home Depot project at 491 Bayshore Boulevard. Thank you for your consideration of these comments." (*Gina M. Solomon, M.D., M.P.H., written comments*)

- ¹ Brunekreef B., Janssen N.A., de Hartog J., Haressem H., Knappe M., van Vliet P. Air pollution from truck traffic and lung function in children living near motorways. *Epidemiology* 8:298-303, 1997.
- ² Ciccone G., Fostastiere F., Agabati N., Biggeri A., Bisanti L., Chellini E., et al. Road traffic and adverse respiratory effects in children. SIDRIA Collaborative Group. *Occup Environ Med* 55:771-778, 1998.
- ³ Duhme H., Weiland S.K., Keil U., Kraemer B., Schmid M., Stender M., Chambless L. The association between self-reported symptoms of asthma and allergic rhinitis and self-reported traffic density on street of residence in adolescents. *Epidemiology* 7:578-582, 1996.
- ⁴ Pekkanen J., et al. Effects of ultrafine and fine particles in urban air on peak expiratory flow among children with asthmatic symptoms. *Environ Res* 1997;74(1):24-33.
- ⁵ Guaderman J.W., McConnell R., Gilliland F., London S., Tomas D., Avol E., Vora H., Berhane K., Rappaport E.B., Lurmann F. Association between air pollution and lung function growth in Southern California children. *Am J Respir Crit Care Med* 162:1384-1390, 2000.
- ⁶ U.S. EPA National Air Pollutant Emission Trends. Office of Air Quality Planning and Research, 1900-1996, Appendix A. Washington DC: Environmental Protection Agency, 1997.
- ⁷ Mortimer K.M., Neas L.M., Dockery D.W., Redline S., Tager I.B. The effect of air pollution on inner-city children with asthma. *Eur Respir J* 19:699-705, 2002.
- ⁸ Norris G., Young Pong S.N., Koenig J.Q., Larson T.V., Sheppard L., Stout J.W. An association between fine particles and asthma emergency department visits for children in Seattle. *Environ Health Perspect* 107:489-493, 1999.
- ⁹ Studnicka M., Hackl E., Pischinger J., Fangmeyer C., Haschke N., Kuhr J., Urbanek R., Neumann M., Frischer T. Traffic-related NO₂ and the prevalence of asthma and respiratory symptoms in seven year olds. *Eur Respir J* 10:2275-2278, 1997.
- ¹⁰ Jorres R., Nowalk D., Magnussen H. The effect of ozone exposure on allergen responsiveness in subjects with asthma or rhinitis. *Am J Respir Crit Care Med* 153:56-64, 1996.
- ¹¹ Strand V., Svartengren M., Rak S., Barck C., Bylin G. Repeated exposure to an ambient level of NO₂ enhances asthmatic response to a nonsymptomatic allergen dose. *Eur Respir J* 12:6-12, 1998.
- ¹² Diaz-Sanchez D., Garcia M.P., Wang M., Jyräla M., Saxon A. Nasal challenge with diesel exhaust particles can induce sensitization to a neoallergen in the human mucosa. *J Allergy Clin Immunol* 104:1183-1188, 1999.
- ¹³ McConnell R., Berhane K., Gilliland F., London S.J., Islam T., Gauderman W.J., et al. Asthma in exercising children exposed to ozone: a cohort study. *Lancet* 359:386-391, 2001.

"I write this letter both as a 33-year resident of Bernal Heights and as the Director of Air Quality Advocacy for the American Lung Association of San Francisco and San Mateo counties. I often testify on air quality issues in the Bay Area, and am currently funded by the San Francisco Foundation to coordinate the Bay Area Clean Air Task Force, comprised of many credible well-known environmental organizations.

"But now to the science. The proposed project will significantly increase regional ozone pollution in a non-attainment area. The EIR found that the project would be responsible for an estimated 84.5 lbs. per day of reactive organic gases, meaning that there would be a 'significant unavoidable impact' on air quality. This also translates into precursors for ozone smog, and this is unacceptable.

"The effect of all this traffic pollution on public health is well documented, both nationally and internationally. An international study, implemented on every continent, indicated that, no matter what the economic situation, no matter the variances in ethnicity and health care system, that as ozone levels increase, there is a corresponding increase in hospitalizations and death due to respiratory problems.

"Closer to home, and in relation to children, the results of the recent Southern California Children's Health Study, the most extensive study to date regarding air pollution and children's health, has shown that, over time, the growth and development of the lungs is compromised in children living in areas of high pollution. These kids' lungs simply do not grow to the appropriate size for their bodies. And in another recent 10-year study, a new and startling fact revealed that smog not only triggers asthma attacks, but also can actually cause children to acquire asthma in the first place. Children are particularly vulnerable to the effects of breathing polluted air because their lungs are still developing, and they are more active, breathing in more air than adults. Because ozone smog is an increasing problem in the Bay Area, and because this proposed project is documented to create an 'unmitigable impact' that includes ozone pollution, building of the Home Depot would contribute to a significant health concern for children living in Bernal Heights and surrounding neighborhoods.

"Finally, the impact of particulate matter must again be emphasized. These tiny particles emitted from vehicle exhaust are among the most harmful of all air pollutants. When inhaled, these tiny particles can lodge deep in the lungs, impair lung function, and exacerbate bronchitis, emphysema, and asthma. Particulate air pollution has been directly linked to increases in emergency room visits for asthma. Asthma itself has been documented to be particularly common in children living along busy roads, which Cortland will undoubtedly become if Home Depot is built.

"In conclusion, this project makes no sense, from an air quality and public health viewpoint, to say nothing of quality of life in the quiet neighborhood of Bernal Heights. In essence, it is simply unacceptable to place a huge retail outlet next to a residential neighborhood. It belongs in a shopping center, away from where folks live. I strongly urge you to reject the proposed Home Depot project on Bayshore Boulevard." (*Linda Weiner, Resident, Director of Air Quality Advocacy for the American Lung Association*)

Response #120

Ozone is a result of a complex series of photochemical reactions in the atmosphere. Computer models of ozone formation require massive amounts of weather and emissions data. Such models are typically used in the development of regional air quality plans, but are not usable for forecasting effects of an individual project.

Regional air quality plans typically assume that levels of ozone are proportional to the total regional emission of ozone precursors, ROG, and NOx. The DEIR in Table 10 on page 92 estimated that the sum of emissions from all trips to or from the project would generate about

84.5 pounds per day of ROG and 67.1 pounds per day of NOx. These emissions would represent a 0.0085 and 0.00554 percent increase in regional emissions of these precursors, respectively.⁵² Under the assumption that levels of ozone are proportional to the total regional emission, the change in ozone levels from these emissions would be immeasurably small even for the most accurate monitoring equipment. As noted in the DEIR on pages 83 and 84, ozone is a regional pollutant rather than a local concern. Local sensitive receptors would experience unchanged levels of ozone, since ozone levels in the neighborhood around the proposed site are unrelated to local emissions.

The above percentages show that the project would not cause a measurable significant impact on regional ozone concentrations, and this is true of all individual projects regardless of size. For this reason, the BAAQMD threshold of significance is not based on a specific change in projected ozone levels, but is based on a mass emission threshold. The use of a mass emission threshold for regional pollutants such as ozone and particulate matter is appropriate because, for an indirect source (something that attracts vehicle-trips from a large area), no individual project would ever cause a violation of a national or state standard. The BAAQMD thresholds provide the definition of an emission that "contributes substantially to an existing or projected air quality violation", with application to both the California and National Ambient Air Quality Standards.

Air pollution plays a well-documented role in asthma attacks, however, the role air pollution plays in initiating asthma is still under study and may involve a very complex set of interactions between indoor and outdoor environmental conditions and genetic susceptibility. Studies have shown that children who participated in several sports and lived in communities with high ozone levels were more likely to develop asthma than the same active children living in areas with less ozone pollution. Other studies have found a direct association between some volatile organic compounds and symptoms in asthmatic children. A large body of evidence has shown significant associations between measured levels of particulate matter outdoors and worsening of both asthma symptoms and acute and chronic bronchitis.

⁵² $84.5 \text{ (daily ROG project emission increase in pounds)} \div 9,940,000 \text{ (regional ROG emission increase in pounds)} = 0.000085$. $67.1 \text{ (daily NOx project emission increase in pounds)} \div 1,211,000 \text{ (regional NOx emission increase in pounds)} = 0.0000554$.

While these general relationships are known, it is not possible to perform a risk assessment for asthma. It is possible to do a health risk assessment for diesel exhaust particulate because specific rates of risk have been identified for the specific pollutant, diesel exhaust particulate. This means that statistical studies have identified a quantified risk associated with a given exposure.

In the case of asthma, no quantified relationship between exposure and health effect has been established. The problem is exacerbated by the multiple pollutants known to cause or worsen asthma. Even if a risk factor were available for ozone and particulate matter (PM₁₀ and PM_{2.5}) (the pollutants most clearly documented as causing asthma), it would not be possible to estimate a project-caused ozone or particulate increment, particularly on the local scale, since both pollutants are regional pollutants at least partially (in the case of particulate matter) or entirely (in the case of ozone) created in the atmosphere by photo-chemical reactions. With the current knowledge of the cause-effect relationship between pollutants and asthma, it is not possible to conduct a quantified risk assessment for asthma in the same manner as was accomplished for diesel exhaust particulate.

The air basin's attainment status with respect to ozone and other pollutants is discussed on pages 85 and 86 of the DEIR. Currently, the state and federally mandated plans do not include indirect source review or a permit system that would require individual indirect sources, such as the proposed project, to get permits from any local, state, or federal air quality agency. Authority to determine the acceptability or unacceptability of unmitigated impacts to air quality and associated impacts to health under CEQA lies with local decision-makers. Also see Response to Comment #116 regarding project particulate impacts.

Comment #121

"Pages 86 and 87 [of the DEIR]: The Criteria of Significance do not take sensitive receptors into account. Although the DEIR mentions (page 82) that a child care center is about 100 yards from the project site, the Criteria of Significance do not recognize the sensitive population. The vulnerability of young children, particularly to diesel exhaust needs to be factored into the analysis of air quality impacts." (*Eve Bach, Arc Ecology Consultant; Barbara Kyle, Resident/No Depot Committee Chair; and Ron Morgan, Bernal Heights Neighborhood Center Community Organizing Coordinator*)

Response #121

The definition of sensitive receptors and identification of nearby sensitive receptors was included on pages 81 and 82 of the DEIR. The Big City Montessori School located at 240 Industrial Street at the northeast corner of Loomis Street, about 300 feet south of the project site and the Bernal Heights residential area west of U.S. Highway 101 (see Figures C&R.3 and C&R.4, pages C&R.22 and C&R.23) were identified as sensitive receptors. The analysis of air quality impacts examines the worst-case conditions of local pollutants such as CO and diesel particulates. Carbon monoxide concentrations were predicted adjacent to the intersections where the highest concentration would be expected as shown in Table 9 on page 91 in the DEIR. Concentrations at the identified sensitive receptors would be less than at these worst-case intersection locations. Since no CO violations were found at the worst-case locations, no violations would be forecast at the identified sensitive receptors. Thus, quantification of impacts at the identified sensitive receptors is not necessary.

The analysis of diesel exhaust risks was performed along Loomis Street, identified as a worst-case location for diesel particulates. As mentioned previously, the Montessori School is a sensitive receptor located at the intersection of Loomis and Industrial Streets. The risks were calculated at the location of highest exposure, on the east side of Loomis Street opposite the proposed Home Depot loading docks, and assumed a 40-year exposure, which is beyond the amount of exposure that would occur for a day care attendee at the Montessori School. Since risks at this worst-case location were found to be less than significant, risks at the more distant Big City Montessori School and Bernal Heights residential area would also be less than significant.

For non-diesel mobile source TACs and for regional pollutants such as particulate matter and ozone, impacts are proportional to the project's contribution to the regional emissions burden and are not felt locally. In this case, the BAAQMD's mass emissions thresholds were utilized, although these impacts would not likely affect local sensitive receptors due to the regional nature of the pollutants.

Comment #122

"I am writing to comment on the Draft Environmental Impact Report (DEIR) for the proposed Home Depot at 491 Bayshore Boulevard (project). I am a resident who opposes this project, because it will cause substantial, significant, and irreversible harm to our neighborhood. My response to the DEIR and my objections to the proposed project are discussed in detail below.

"The DEIR totally fails to consider impacts to many residents of Bernal Heights. The DEIR only specifically considers impacts to air quality on four intersections, only one of which is on Cortland Avenue (DEIR, Table 9). It thus totally fails to consider the significant negative impacts of the additional air pollution from the increased traffic upon the rest of Cortland Avenue. Those impacts will be suffered by residents who live in the immediate vicinity of Cortland Avenue, those who live on side streets near Cortland Avenue, and those who come to the retail area of Cortland Avenue to shop.

"The project will significantly increase air pollution on all of Cortland Avenue. The DEIR fails to adequately discuss the significant environmental effects of the project on many of the residents of Bernal Heights, as required by the California Environmental Quality Act (CEQA).¹ Because the project will cause a large increase in traffic on Cortland Avenue (DEIR [on pages] 5, 6 and at Table 2), the project will have the substantial negative impact of increased air pollution on both residents in the immediate vicinity of Cortland Avenue and on those residents who walk or drive to Cortland to shop. Yet, the DEIR fails to consider any effects of air pollution on Cortland Avenue, except for the east end of Cortland Avenue at Bayshore Boulevard. In fact, traffic also backs up substantially on the retail portion of Cortland Avenue due to the numerous stop signs and pedestrian traffic. This stop-and-go driving causes much more air pollution than the one stop on Bayshore. CEQA requires that the DEIR address, in a detailed statement, 'all significant effects on the environment of the proposed project.'² Merely because the rest of Cortland Avenue's air pollution does not currently exceed the threshold standard set by the Bay Area Air Quality Management District does not mean that the increased air pollution is not significant. Significant effects are those that cause 'adverse changes in physical conditions which exist within the area,'³ not only those that cause a level of pollution to exceed a certain threshold. As additional air pollution will certainly cause changes in the physical conditions along Cortland Avenue and those changes will most likely be substantial, the DEIR must address the negative effects of the large amount of additional air pollution that will be caused by this project along the entirety of Cortland Avenue, which it fails to do.

"The DEIR also fails to consider the increased air pollution that will be caused on side streets near Cortland Avenue as drivers attempt to escape the traffic jams that will be caused by the significantly increased traffic. These side streets currently have extremely little traffic, so any increase in emitted air pollution from the current level of almost nothing will be exponential, and thus substantial by definition and very significant. The DEIR completely fails to address the adverse significant impacts of added air pollution to the side streets that will be used to avoid the heavy traffic on Cortland."
(Jeff Hoffman, Resident)

¹ Public Resources Code Section 21100(b)(1).

² Ibid.

³ Public Resources Code Section 21100(d).

Response #122

The most important pollutant on the local scale emitted by automobiles is CO and is discussed above in the previous response. Increases of CO concentration that do not cause exceedance of the ambient standards are not considered significant. The ambient air quality standard represents a level below which no health effects would occur. While the standards are regularly reviewed by state and federal agencies to determine if new information on health effects were to warrant a change in the standards, no such review is currently being undertaken by either the California Air Resources Board or U.S. Environmental Protection Agency.

The BAAQMD CEQA *Guidelines* used by San Francisco provide the following significance threshold for CO: "*A project contributing to CO concentrations exceeding the State Ambient Air Quality Standard of 9 parts per million (ppm) averaged over 8 hours and 20 ppm for 1 hour would be considered to have a significant impact.*" The District's thresholds of significance are based on the State Office of Planning and Research definitions of significant environmental effect.⁵³ Section 15382 of the State CEQA *Guidelines* defines "significant effect on the environment" as "*a substantial or potentially substantial, adverse change in any of the physical conditions with the area affected by the project including...air.*" This language is reflective of Section 22100(d) of the Public Resources Code: "*...any significant effect on the environment shall be limited to substantial, or potentially substantial, adverse changes in physical conditions which exist within the area....*"

The BAAQMD CEQA *Guidelines* require analysis of CO concentrations at worst-case locations. For an indirect source, such as the proposed project, the maximum impact will occur at surface street intersections, which are locations where traffic volumes, vehicle idling, and congestion are maximized. The *Guidelines* direct that the CO modeling be carried out for the intersections with the worst congestion as defined by Level of Service (LOS). The LOS forecasts for all intersections studied were reviewed and those intersections meeting the BAAQMD criteria for modeling (change in LOS D or worse) were selected for study. These intersections are intended to represent the location of highest concentration within the community. Based on LOS and delay in the PM peak hour, four intersections were selected

⁵³ BAAQMD CEQA *Guidelines*, page 11.

for analysis based on "existing plus project" traffic (Bayshore at Oakdale, Bayshore at Cortland, Bayshore at Industrial, and Bayshore at Jerrold/U.S. 101). The PM peak hour was used rather than Saturday midday peak hours because the weather conditions required for peak CO concentrations (cold temperatures, light winds, no sunlight, high atmospheric stability) do not occur in the midday hours. Each of the four intersections was forecast to operate at LOS D in the PM peak hour. All other intersections studied, including the intersections of Mission, Andover, and Folsom with Cortland Avenue, would operate at LOS C or better under "existing plus project" conditions, and thus do not meet the BAAQMD criterion for modeling.

Concentrations were forecasted for existing, existing plus project, and cumulative traffic conditions. The modeling method produced forecasts of maximum 1-hour and 8-hour concentrations during worst-case meteorological conditions. These predicted concentrations are, according to the *Guidelines*, to be compared to the state and federal standards.

Table 9 on page 91 of the DEIR showed concentrations below the ambient air quality standards for existing, existing plus project, and cumulative traffic conditions. Since no violations are predicted at these worst-case-scenario intersections where a violation would be most likely, it follows that no violations are predicted at other locations, including areas of and side streets near Cortland Avenue other than the Bayshore/Cortland intersection, and neighboring streets within Bernal Heights.

The results of the DEIR analysis are consistent with the current attainment status of CO in the Bay Area and current trends of CO concentration. The Bay Area is an attainment area for this pollutant. Concentrations, as measured at monitoring sites, have been steadily declining for over 25 years and are forecast to continue declining in the future due to a variety of factors such as stronger emissions controls on vehicles (including diesel), increase of low pollutant emission vehicles, and reformulated fuels. There have been no measured violations of this standard anywhere in the Bay Area since 1991, even in the South Bay where background levels of CO and congestion levels are maximal.

Comment #123

"I want to reflect for a moment on what we know about air pollution now, that we didn't know ten years ago. You know, air pollution is worse than we thought. It causes a lot of health effects today, at levels that we see in the City and County of San Francisco and other major metropolitan areas. And it is something you really need to think about when we're doing planning. I think that planning in a community perhaps has a way to go yet, in thinking about how land use and transportation relates to air quality and the health significance of some of your decisions. So I'm going to frame these comments with that.

"I think that air pollution is very important on behalf of the community, and we need to take the analysis very seriously for a project like this, where congestion is a major issue. The second big point I wanted to make is that vehicle pollution in cities now is one of the most important sources of air pollution. So when you think about what kind of pollution levels we're seeing, a lot of it comes from vehicles. So how we manage land, transportation, etc., to a large extent determines what we have in the way of air pollution, and then related health effects. So all these things go together. And I think it is, as I say, very important to analyze them in a serious and well-grounded way. Now I don't think that this draft environmental impact report does that. And I'm speaking to you as someone who has some expertise in this area. I'm not being a consultant to anyone, but I do have research and teaching appointments at the UC-Berkeley School of Public Health, and the area of environmental health sciences is my area of expertise. I have a PhD in that area, and I have published research on air pollution and children's health and so on. I'm speaking to you just as a resident who has some expertise in this area.

"But what this DEIR does not do is it doesn't look at the current knowledge of the effects of air pollutants. It is looking at the older standards for particulate matter and so on. It is not looking at newer standards that have been adopted in the last few years by the US EPA and by the State, that correspond to some of this emerging research about health effects of particulate matter and other pollutants. So the analysis is very severely flawed, and I believe that staff needs to go back and look at the current standards that have been adopted, that are closer to reflecting what we know about these effects, and think about how it would relate to this project." (*Amy D. Kyle, Ph.D., M.P.H., Resident, oral testimony*)

"I am a resident of the Bernal Heights neighborhood, which is immediately adjacent to the project site. I have research and teaching appointments at the School of Public Health at the University of California, Berkeley. I have a doctoral degree in environmental health sciences and masters of public health. My areas of expertise are impacts of air pollutants and transportation policies on communities and children's environmental health and I have published research on these (and other) topics.

"I have grave concerns about the Environmental Impact Report. Specifically, the report does not fully address the obviously foreseeable air quality impacts of the proposed project; the report does not address the congestion impacts of the neighborhoods adjacent to the site of the proposed project; and the report does not address the health impacts of increased congestion and loss of a pedestrian-oriented focus to the adjacent neighborhoods.

"The huge Home Depot project will have significant adverse effects on the quality of the Bernal Heights neighborhood that cannot be mitigated by the largely cosmetic changes being suggested. This can be anticipated to have significant, adverse effects on the health of the community. [These are the kinds of effects that the Planning Department is supposed to prevent.]

"The Home Depot project is out of scale to the community in which it would be located. It will have unacceptable air quality and health impacts. It will severely diminish the quality of life and the capacity for pedestrian access to the commercial area that is the heart of the Bernal Heights community. It should not be permitted to proceed.

"The report does not address the significant cumulative risk that will result when the new emissions of hazardous air pollutants are added to the already significantly elevated concentrations of hazardous air pollutants found in San Francisco. The DEIR is correct that these pollutants are not monitored as extensively as the criteria pollutants such as particulate matter or ozone. We know that health risks posed by hazardous air pollutants are significant and probably exceed, for the general population, risks posed by exposure to toxics in any other medium. The U.S. EPA first analyzed the health risks of toxics in the ambient air in the 1990 Cumulative Exposure Project, which used a computer model to estimate the amount of about 140 hazardous air pollutants in each census tract in the U.S. and then calculated the health risks that would result from this. This study concluded that virtually everyone in the U.S. is exposed to concentrations of hazardous air pollutants of health concern.^{1,2} The U.S. EPA ran another assessment of the hazardous air pollutants nationally, using emissions data for 1996. This National Air Toxics Assessment was released in May 2002 and reported similar results. The estimates for San Francisco tend to be higher than those for other Bay Area counties. This means that the people of San Francisco are already at risk for effects of exposure to these pollutants and that increases to this existing exposure need to be avoided. In the City and County of San Francisco, the average cancer risk is around 5 per 100,000. This means that, over a lifetime, about 5 people per 100,000 would be expected to develop cancer because of exposure to this mix of pollutants. However, the most highly exposed people have a substantially higher risk. The 95th percentile is estimated to be about 8 per 100,000. Adding to this already elevated risk is a significant impact.

"The report does not address the combined impacts of the freeways coming into the area of the project site, combined with increased emissions from the site. It is well established that concentrations of pollutants are elevated in the vicinity of freeways. This heightened burden of pollution already exists in the project area. The emissions from the traffic and congestion would be added to this already elevated level of pollution. This needs to be addressed." (*Amy D. Kyle, Ph.D., M.P.H., Resident, written comments*)

¹ Woodruff, T.J., et al. Public health implications of 1990 air toxics concentrations across the United States. *Environmental Health Perspectives*, 1998. 106(5): p. 245-251.

² Woodruff, T.J., et al. Estimating cancer risk from outdoor concentrations of hazardous air pollutants in 1990. *Environ Research*, 2000. 82(3): p. 194-206.

Response #123

The specific location of freeways relative to the project does not affect the analysis of regional air quality impacts (sum of all emissions from all trips to or from the site), since the freeways are considered part of the total regional background and combined regional air quality analysis. Freeway proximity to the project would also not have an effect on the analysis of risk from diesel exhaust, which examined the incremental health risks from

project truck traffic near sensitive receptors. (See Response to Comment #116 for additional information on risks from other mobile source emissions.)

The CO analysis does reflect the presence of freeways. The background concentrations used in the DEIR analysis are based on a BAAQMD analysis of worst-case 1-hour and 8-hour standards that reflect the presence of major sources such as freeways (i.e., concentrations near freeways are higher).

See Response to Comment #115 regarding current standards and their relationship to the standards of significance used in the DEIR.

See Responses to Comments #115, 116, and 120 regarding health risk effects and potential cancer risk effects.

See Responses to Comments #117 through #122, which address the potential effects of traffic congestion on air quality in neighborhoods.

See Response to Comment #116 which provides information and analysis regarding toxic air pollutant health risks from the proposed project and cumulative risks from hazardous air pollutants.

See Response to Comment #70 which addresses pedestrian access in Bernal Heights.

See Response to Comment #24 regarding social and economic impacts.

Comment #124

"The traffic volume relied on in the air quality analysis in the Draft EIR is derived from the transportation impact analysis therein.¹ As discussed above, the Overland Study contains an analysis of traffic impacts that, in our opinion, is more realistic. Because the volume of vehicles is lower in this revised estimate, the corresponding air quality impacts related to vehicle emissions would also be less than indicated in the Draft EIR, as shown in the Baseline Environmental Consultants analysis attached to this letter as Exhibit B. [Refer to Appendix E of this document, Anna C. Shimko Letter dated July 11, 2003.] This expert analysis demonstrates that, in fact, the projected regional reactive organic compound (ROG) impacts would be below the Bay Area Air Quality Management District's

significance threshold level of 80 pounds per day. This means that, in reality, the proposed project would not cause a significant impact on air quality. Thus, the project would not result in any significant environmental impacts that could not be mitigated." (*Anna C. Shimko, Attorney at Law for Home Depot*)

¹ Note that because the store is not yet open, these estimates are necessarily approximations, based on information from other comparable Home Depot stores, of the total hours worked per week as well as the potential ratio of full-time to part-time employees.

Response #124

The air quality impact analysis utilized the traffic generation information presented in the Transportation section of the DEIR. If traffic volumes were indeed lower than the DEIR analysis, the air quality impacts would be less than depicted in the DEIR.

Comment #125

The following comments are grouped together because they express concerns about the potential effects of the proposed project related to air quality, however, they are not specific to the adequacy of the DEIR and the air quality analyses.

"My wife and daughter suffer from asthma. This will be exacerbated by increased traffic and pollution in this area. Please vote no on home depot." (*Scott Barlow, Resident*)

"I think that it will have an effect of adding pollution, because there will be cars idling, as they wait to pull into the lot." (*Amy Beinart, Resident*)

"I believe this will have a negative impact on the environment of San Francisco. The air pollution would be horrendous from the traffic and big trucks." (*Sharon Carew, Resident*)

"[We are concerned about] increased air pollution from greatly increased traffic (and idling cars as they want to pull in)." (*Melissa M. Diagana, Resident*)

"The stated environmental impacts are unacceptable. I point to the significant adverse effect on regional air quality." (*Shannon Dodge, Resident*)

"Significant impact on regional air quality: This is air that rises from Bayshore, blows over my fine neighborhood, but ends up in Oakland; Fremont – should we advocate that sort of project? We should be given the opportunity to evaluate the proposed development based on accurate data. It would be irresponsible of us to accept the document as written, in my opinion. For those of you with the power to reject the findings that came within the documentation, I ask that you do so,

respectfully." *(Daniel Dodt, Bayview Resident, Chair of the BVHP-PAC Economic Development Committee, Member of the Bayview Merchants Association and Revere Avenue Residents Association)*

"We are concerned about air quality as well, as is BAAQMD. All those cars visiting this store will create a serious increase in pollution harmful... especially to children, the elderly and persons with lung problems." *(Ellen M. Frank and Joseph Majer, Residents)*

"We are confident that you will not approve any plan that would, 'exceed the Bay Area Air Quality Management District established threshold of significance of 80 pounds per day for emissions of reactive organic gases (ROG) and would be considered to have a significant adverse environmental effect on air quality.'" ¹ *(Michael Grafton and David Ayoob, Co-Presidents, Cortland Merchants Association)*

¹ DEIR, 3/29/03, page 91.

"Home Depot is not the type of development the Bernal and Bayview communities will derive adequate benefit from, given the severe environmental impacts generated. These impacts include an increase in vehicular traffic and pollution at a level far above more sustainable development such as housing, small business, and light manufacturing or services." *(Jonathan Gray, Resident)*

"The proposed Home Depot is 153,000 square feet and, at that size, exceeds the air pollution standards. Additionally, if Home Depot is a lynchpin of a Bayshore redevelopment plan, then other stores will be contributing to an ever greater air pollution level. Yet, they are not being taken into account. The proposed Home Depot could be reduced to 100,000 square feet and still be economically viable and fall under the air pollution levels. Therefore, why would you or anyone support an oversized Home Depot (183k) which severely degrades air quality when a viable alternative is available? I urge a support of a smaller Home Depot or none at all." *(Sophia Green, Resident)*

"This project does not meet air quality standards. It should be rejected on that point alone. This is the 21st century; when are we going to stop approving unsustainable car-dependent urban planning and begin focusing on transit-friendly urban development instead. This corner is very well served by a number of different bus lines." *(Nic Griffin, Resident)*

"I do not believe the draft EIR properly evaluated the effects of air pollution in a residential and very small business district along Cortland Avenue." *(Jeff Hoffman, Resident)*

"You are going to have an increase in air pollution beyond what has been specified here in the draft." *(Douglas Holloway, Resident)*

"There will be increased air and noise pollution. We don't need more, we need less. Idling cars on Cortland and impatient drivers are a bad combination. We already have a huge problem of double-parked cars on Cortland; imagine the backed-up traffic and all those cars honking." *(Alyson Jacks, Resident)*

"There is a lot of air pollution already down there. I'm not there in my car breathing filtered air through my heater or my air conditioner. I smell the diesel that's already down there from the big trucks. If they are going to be idling on Bayshore while I'm cycling, it is going to hurt my lungs. By 2015 they are talking about on ramps are going to be packed." (*Rachel Kesel, Resident*)

"I am also very concerned about the pollution coming from increased automobile traffic. We have children and pets to safeguard." (*Lynnly Labovitz, Resident*)

"Bernal Heights is surrounded on two sides by freeways (101 and 280). Adding the additional traffic would increase traffic noise and pollution. This is of particular concern to parents that raise small children." (*Michael D., Linda, Catriona, Hanh, and Michael L. Larson, Residents*)

"Air quality will be degraded even more in an area of the city that already suffers from too much cases of asthma, especially among children. Bringing in additional cars and trucks from all directions of the city and peninsula will create a greater and unacceptable environmental degradation of the whole area, both in terms of traffic congestion and air quality degradation." (*Rosanne Liggett, Resident*)

"I have talked to other neighbors, who are moms and dads, and they are especially concerned about pollution issues. I think it is clear that the EIR – existing government standards for regional emissions for ozone – are unacceptable, and there is no way to ameliorate this. Now I have lost – and I don't know how much you have lost to cancer. I lost a niece at 29; a one-year old child to skin cancer. This is the fastest-growing cancer in the United States in our populace. I think this really needs to be addressed. In addition, teachers and parents are concerned about emphysema and respiratory issues." (*Mark Lynch, Resident*)

"The other thing is on Cortland, the pollution: As far as the EIR report, I can tell you right now it is so dirty my windows I have to clean them like every four days to keep them clean; they are very grimy. I would just be really unhappy just to think about the amount of traffic this will bring. Again, just being a citizen of San Francisco and a resident of Bernal Heights, I just want to speak out and say that I'm really against this, because it would be affect my living environment in a negative way." (*Katherine Massey, Resident*)

"We have two children (2 yrs and 6 yrs) and are proud to be Bernal Heights homeowners. The air quality is our top priority for all children, adults, etc. We walk around the neighborhood and enjoy the 'quiet' feel." (*Nina Mayer, Resident*)

"The air quality in these areas is already in bad shape." (*Bill Nieto, Resident*)

"It will have an adverse effect on regional air quality." (*Chava Nieto, Resident*)

"The air quality will worsen." (*Jo Ann Ogden, Resident*)

"Air pollution." (*Barbara Paley, Resident*)

"[W]ith respect to air quality, this is like a Nimby issue, as I like to show where the X is here, where my home is. As you know, when you have smog, you have haze; when you have haze, you can't see anything. So when you are talking about the antiglare problem from their roof, in addition to the

smog that's created, those of us who currently have views of the East Bay are going to have views of white.

"[W]ith respect to fumes and air quality, I can already smell Sunset Scavenger when they bring their trash down by Bayshore and CalTrain. How much more gas exhaust, etc. am I going to smell from my house at this current time with a Home Depot there?" (*Gil Payne, Resident*)

"I walk on Cortland Street to use the markets there. When there are traffic backups these days – due to trucks unloading or increased auto use – I can feel the difference in the air pollution affecting my breathing. If Home Depot moves to Bayshore, there will be much, much greater traffic backups and many more idling cars. I know this will further compromise my respiratory system. Increased traffic, backups, and idling cars are inevitable on a small two-lane street like Cortland. If my body – a relatively healthy male – will be adversely affected, I can imagine the danger it will do to children (who use the library and playground on Cortland) and seniors who use the Neighborhood Center. I fear the health risks to me and my neighbors." (*Peter Rothblatt, Resident*)

"Already, I choose alternate walking routes because the air pollution on Cortland is irritating to my lungs. More traffic on Cortland, Mission, and Bayshore would be intolerable. I firmly oppose a Home Depot on Bayshore Boulevard." (*Katherine Truka, Resident*)

"I do not support turning Bayshore into a Big Box Alley and especially there, at the foot of Cortland, which has already failed air quality tests [in] the Environmental Impact Report." (*Jennifer Ware, Resident*)

"I am afraid that the air quality will be affected to the point where neighbors will feel health impacts. The EIR has admitted that this will probably be the case." (*Marci Yellin, Resident*)

"I am concerned about the air quality ... on Cortland, Mission, and Bayshore." (*Paula Young, Resident*)

Response #125

The air quality impacts of the proposed project are addressed in the DEIR on pages 81 to 93. The applicable regulations were identified, the types of air quality pollutants were explained, the existing air quality conditions were discussed, the significance criteria for air quality analysis were addressed and the impacts of the proposed project were identified for both the construction and the operation of the project. Sensitive receptors were discussed on pages 81 and 82 in the DEIR. The previous responses incorporated and/or identified the latest data available that was not originally in the DEIR. This new information included health risk data from TACs in the Bay Area (Response to Comment #116), updated air quality data (Response to Comment #115), and recent revisions to the state and ambient air quality standards (Response to Comment #115).

The air quality analysis noted that the estimated CO concentrations with project-generated traffic would be below the applicable state/federal standards (20 parts per million [ppm] for the 1-hour standard and 9 ppm for the 8-hour standard), and would be a less-than-significant impact. The proposed project would exceed the BAAQMD established threshold of significance of 80 pounds per day for emissions of reactive organic gases (ROG) and would be considered to have a significant adverse environmental effect on air quality. This significant impact would occur regionally within the multi-county air basin and would not be reflective of local conditions in San Francisco (i.e., the effects would be felt over the entire air basin rather than the project neighborhood).

The issue of odors was discussed on page A-16, Appendix A of the DEIR, which noted that the proposed project would be a retail home improvement and supply store, and would not contain products or generate uses that would permeate its vicinity with objectionable odors. Generally, vehicle-generated exhaust odors relate to concentration of diesel exhaust, which was addressed in Responses to Comments #116 and #121.

The DEIR was prepared in accordance with CEQA Section 15126.2, Consideration and Discussion of Significant Environmental Impacts, and identified and focused on the significant environmental effects of the proposed project, including those impacts that can be mitigated but not reduced to a level of insignificance. Since the proposed project would exceed the BAAQMD thresholds of significance for ROG, the project would have a significant project-level and cumulative impact on regional air quality. This is a non-mitigable impact and is identified on page 113 in the DEIR. The DEIR also included alternatives to reduce the air quality impacts to less-than-significant levels. The project impacts related to health effects were assessed by forecasting with a computer program the worst-case levels of CO (a criteria pollutant) at intersections with the worst LOS, and evaluating with a computer program diesel particulates (comprised of PM_{2.5} and the TAC that is the single most important pollutant in determining TAC health risks in the Bay Area). Worst-case CO concentrations and TAC risk levels were found to be below the BAAQMD thresholds of significance and would be less-than-significant.

The Planning Commission would review the EIR for adequacy and would decide to approve, modify, or deny the project. If the project were approved as proposed, the Planning

Commission would be required to adopt a Statement of Overriding Considerations for the significant air quality impacts.

Comment #126

"So it is not inconsistent that a big corporate entity comes into the city, and the presumption is that it is going to have an impact on small businesses. If you give the nature of the fact that we have so much outflow from here, in terms of traffic to South San Francisco to Colma right now for some of the shopping facilities, we could very well make the opposite argument that having Home Depot where it is at will in fact reduce traffic in terms of its pollution impact; in terms of the environment." *(Joe O'Donoghue, Resident)*

"And maybe it is a little more pollution, but you know what? There's a freeway, 101, right between that and Bernal Heights, or any other residential neighborhood. So you can't possibly think it would change much of that." *(Steve St. Denny, Business Owner)*

Response #126

The comments are noted and no further response is required.

NOISE

Comment #127

"I do not believe the draft EIR properly evaluated the effects of noise in a residential and very small business district along Cortland Avenue." (*Jeff Hoffman, Resident, oral testimony*)

"Likewise, the negative impacts of additional noise – which the DEIR failed to consider – in a residential neighborhood or a retail area to which most of us walk cannot be mitigated.

"The DEIR also does not consider the significant negative impact upon those people of the additional noise from the increased traffic...

"The project will increase noise along and near Cortland Avenue. All physical conditions, including noise, that exist within an area affected by the project must be addressed by the DEIR.¹ Increased noise is a change in the existing physical conditions of the affected area, so that this increased noise is significant. However, the DEIR fails to address the significant negative effects of the increased noise on and near Cortland Avenue that will be caused by the large increase in traffic from the project. This increased noise will be substantial because Cortland is only a two-lane street. Not only will increased noise occur along all of Cortland Avenue, but on the above-mentioned side streets near Cortland that drivers will be using in order to escape the larger traffic jams that the project will cause. The increase in noise on the side streets will be even more substantial than that on Cortland, because those streets currently have very little traffic, so that any amount of additional traffic is a very large increase in the noise, is substantial, and thus must be addressed." (*Jeff Hoffman, Resident, written comments*)

¹ Public Resources Code Section 21060.5.

Response #127

The potential noise effects of the project were addressed in the Initial Study, Appendix A of the DEIR, on pages A-14 to A-15. Although noise levels were not measured on Bayshore Boulevard, the average traffic-generated noise level in an urban setting is generally mid-60s dBA.⁵⁴ The discussion in the DEIR addresses project operational noise, noise during the construction, and noise related to the increase in traffic. The DEIR notes that ambient noise levels in the vicinity of the project are typical of noise levels in industrial neighborhoods in San Francisco, which are dominated by vehicular traffic, including trucks, cars, Muni buses, emergency vehicles, new construction in the area, and industrial activities. The DEIR

⁵⁴ dBA is a measure of sound units in decibels (dB). The "A" denotes the A-weighted scale which simulates the response of the human ear to various frequencies of sound.

acknowledges that the project would generate noise from vehicles arriving and departing from the parking structure and trucks making deliveries to the project site.

Generally, traffic must double in volume to produce a noticeable increase in noise levels.⁵⁵ Table 6 on page 80 of the DEIR indicates that project-generated traffic would range from 1.1 percent (from 1,452 vehicles to 1,670 vehicles at the U.S. 101 northbound on-ramp at Bayshore Boulevard/Cesar Chavez Street) to 27.6 percent (from 2,308 vehicles to 3,664 vehicles at the Bayshore Boulevard/Cortland Avenue intersection) of the total traffic volumes in the area during both the Weekday PM and Saturday midday peak hour conditions, which represent the greatest amount of traffic contributions to new noise sources. Thus, the project would not cause a doubling in traffic volumes in the project area, and therefore would not cause a noticeable increase in the ambient noise level in the project vicinity. Therefore, traffic noise would not be considered a potentially significant impact.

Noise originating during project operation after 6:00 p.m. or before 8:00 a.m. would not be significant. Even if the project were to be open on a 24-hour basis and some deliveries were to occur at night, nighttime customers and deliveries would generate even less traffic, and therefore less traffic noise. Nighttime ambient noise levels are lower than daytime, however, project-generated noise impacts from traffic and loading would be less-than-significant.

⁵⁵ *Downtown Plan EIR, Vol. 1*, Section IV.E generally and pp. IV.J.8-18. Increases of one dBA or less in environmental noise are not noticeable by most people outside a laboratory situation (*National Academy of Sciences, Highway Research Board, Research Report. 117 (1971)*). Also *FHWA Highway Traffic Noise Prediction Model, Report #FHWA-RD-77-108, December 1978*, p. 8, regarding doubling of traffic volumes producing increases of 3 dBA or more, which are noticed by most people.)

HAZARDS AND HAZARDOUS MATERIALS

Comment #128

"Page 96 [of the DEIR]: The standard for lead hazard is 750 ppm, not 1,000 ppm.¹" (*Eve Bach, Arc Ecology Consultant; Barbara Kyle, Resident/No Depot Committee Chair; and Ron Morgan, Bernal Heights Neighborhood Center Community Organizing Coordinator*)

¹ U.S. EPA 2002 Preliminary Remediation Goals.

Response #128

The commenters are correct. The present standard for lead hazard is 750 parts per million (ppm).

This revision does not change the conclusion in the DEIR that there would be no potential significant hazardous material impacts associated with the proposed project.

The DEIR indicates that the Phase II investigations revealed elevated levels of lead in the soil. Of 96 samples taken, three were above 750 ppm (770 ppm, 781 ppm, and 4,820 ppm). The mitigation measures listed on pages 107 through 109 in the Draft EIR would ensure that the hazardous levels of lead would be removed from the site and treated in accordance with regulatory guidelines.

The DEIR is revised to reflect the new lead threshold standard as follows:

On page 96, second full paragraph, second sentence, is revised to read: "The DPH Environmental Health-Hazardous Waste Unit (EHS-HWU) considers soils with a total lead concentration of over ~~1,000~~ 750 parts per million (ppm) to be potentially hazardous."

On page 99, second line from the top of the page, is revised to read: "The *California Code of Regulations, Title 22*, considers soil with lead to be hazardous waste if it exceeds a total concentration of ~~1,000~~ 750 parts per million (ppm) and a soluble

VII. COMMENTS AND RESPONSES

HAZARDS AND HAZARDOUS MATERIALS

concentration of 5 ppm. The Phase II investigation revealed elevated levels of lead, however, only ~~one~~ **three** of the 45 samples exceeded the threshold concentration."

SOILS AND SEISMICITY

Comment #129

"The Draft EIR states that the subsurface conditions at the project site are underlain by about 9 to 22 feet of uncompacted and undocumented artificial fills over Bay Mud deposits, combined with groundwater levels from 9 to 14 feet below the surface.¹ Since the project intends to store inventory in warehouse style fully accessible by the public, the EIR must study the impacts of seismic events on the style of storage racks used by Home Depot.

"The public safety issues of merchandise spillage from Home Depot racks during seismic events required by an independent seismic consultant and their recommendations need to be included in the EIR.² Falling merchandise has been recognized as a significant safety hazard at Home Depot,³ and this is especially critical for storage of toxic materials identified by the State of California in Home Depot inventory, as the project is sited on soil vulnerable to seismic disruption." (*Eve Bach, Arc Ecology Consultant; Barbara Kyle, Resident/No Depot Committee Chair; and Ron Morgan, Bernal Heights Neighborhood Center Community Organizing Coordinator*)

¹ DEIR, pages 95-96.

² The California Seismic Safety Commission conducted a 2001 study on general warehouse-style merchandise racks, but their conclusion was that more specific studies need to be conducted.

³ "Falling Doors Kill Boy at Home Depot," <http://atlanta.bizjournals.com/atlanta/2003/05/19/story1.html>; also <http://www.fallingmerchandise.com/lawsuits.asp>; "Eight lawsuits for falling merchandise against Home Depot since January 2000" (Kings County, WA), <http://www.kirotv.com/consumer/2217901/detail.html>.

"Page 26 [of the DEIR:] Please explain seismic safety of tilt-up concrete walls with a concrete slab floor on seismically unstable fill. Particularly with heavy merchandise that is stacked high above the floor on shelves. Home Depot has had merchandise toppling on staff and customers when there was no earthquake. Please detail how, when those accidents occurred. How do the risks increase on this fill site on unstable land?" (*Sue C. Hestor, Attorney at Law, on behalf of Cole Hardware*)

"The other thing I would like to say is I think the issue of earthquake safety and seismic safety has not been adequately addressed in the DEIR. Some of the big-box stores have been known to inadequately have their things stored on shelves, and people have been injured in stores from things falling off of these shelves. And I don't think that the earthquake safety has been adequately addressed in San Francisco for these kind of shelves, and storage of things up high. People have been known to be injured." (*Rosanne Liggett, Resident*)

Response #129

The geology of the project site is addressed in the Initial Study, Appendix A of the DEIR, on pages A-18 and A-19. The project site is in area of potential seismic activity (as is most of San Francisco and the Bay area). A geotechnical investigation (referenced in the Initial

Study) was prepared for the project site by Geotechnical Professionals, Inc.⁵⁶ The report noted that the project site would be suitable for development providing that the recommendations included in the report were incorporated into the design and construction of the proposed development. These recommendations indicated that the proposed Home Depot building and parking garage should be supported on precast, prestressed, concrete piles and structures. Since the building would be pile supported, the report noted that further mitigation to resist liquefaction of the materials (in the event of an earthquake) below the project's foundation would not be needed. The depth of the piles is expected to vary from 30 to 115 feet below ground surface. The depth to the top of the dense soil/bedrock would determine actual depths. The DEIR indicated in Appendix A on page A-18 that the seven feet of fill required to raise the grades along the eastern portion of the site would experience about 14 inches of settlement over thirty years. Access to the store on the east side would require a transition or hinged slab to allow for the anticipated long-term settlement.

The Initial Study in the DEIR also noted that potential damage to structures from geologic hazards on a project site would be mitigated through the Department of Building Inspection (DBI) review of the building permit application pursuant to DBI implementation of the San Francisco *Building Code*.

Home Depot would require merchandise storage racks to be no higher than 12 feet with chainlink-type fencing placed on top of each rack to prevent items from falling. Individual items would not be stored on the top racks, rather they would be removed from the shipping wrapping and placed on lower shelves for customers to purchase. All storage racks would be bolted to the floors. Thus, during review of the project design, DBI would ensure that seismic requirements are met and that Home Depot would implement measures to maximize customer safety during a seismic event. In addition, approval conditions from the Planning Commission as part of its Discretionary Review process could contain measures to ensure seismic safety for customers and employees.

⁵⁶ Geotechnical Professionals, Inc. [GPI], *Revised Geotechnical Investigation, Proposed Home Depot, Bayshore Boulevard and Waterloo, San Francisco, California*, October 18, 2001. This report is available for public review by appointment at the San Francisco Planning Department, 1660 Mission Street, Fifth Floor, San Francisco, as part of Case File 2001.0062E.

Comment #130

"Soil results are not adequately addressed. The Initial Study indicated that quarterly monitoring indicated first three quarters were negative, but the fourth and final monitoring result was not addressed. What is the impact of soil contaminants identified in the soil samples if they are disturbed during excavation of 8,500 cubic feet of soil for the piles? Further discussion of hazardous materials mitigation is needed. Depth for a suitable bearing layer for the piles should vary from 30 to 115 feet below grade; what is the soil quality at this depth? What is the potential exposure to contaminated soils?" (*Shelley Bradford Bell, Planning Commission President*)

Response #130

Subsequent to the publication of the Initial Study, additional information regarding the underground storage tanks and groundwater contamination was obtained and is included in the DEIR on page 97. The San Francisco Department of Public Health Local Oversight Program (DPH-LOP) indicated that the groundwater monitoring results for a one-year period were negative (i.e. there were no elevated concentrations of contaminants). A Remedial Action Completion Certification was issued by the DPH-LOP on January 23, 2002.⁵⁷ Once a Completion Certification is issued, no further action related to the underground petroleum releases at the site is required by the Department of Public Health.

The geotechnical report, cited in the DEIR on page A-18, reported the results of borings to depths of 111 feet below the existing surface of the site. No samples were taken for the presence of hazardous materials. The usual practice for analyzing the potential presence of hazardous materials for projects that are to be constructed at grade is to select shallow borings on the assumption that any potential contamination would generally occur from the surface and penetrate downward. It is unlikely that there would be contaminated materials at 30 to 115 feet below grade as there are no known hazardous materials that have been on the site that could penetrate to such a depth. If there were contaminated soils, they would remain sealed below the site as the placement of piles would not remove any soils.⁵⁸

The potential exposure to any contaminated soils would be minimized through the preparation, implementation, and compliance with the Site Mitigation Plan (SMP) called for

⁵⁷ Letter from Rajiv Dhatia, M.D., DPH-LOP, to Shannon Brundleck, January 23, 2002. This letter is available by appointment for public review at the San Francisco Planning Department, 1660 Mission Street, Fifth Floor, San Francisco, as part of Case File 2001.0062E.

⁵⁸ Robert J. Stechmann, Principal, Stechmann Geoscience, Inc., telephone conversation with Stu During, During Associates, August 30, 2004.

in the Hazards Mitigation Measure on pages 107 to 109 in the DEIR, which would be required as a condition of project approval.

The DEIR identifies mitigation measures on pages 12 through 14 and 107 through 109 to address the issue of potential impacts from hazardous materials on the project site, including the quality of soils disturbed during the excavation and placement of piles, and the potential exposure to any contaminated soils. An SMP would be prepared by the project sponsor and approved by EHS-HWU that would include a discussion of the level of soils contamination on the project site by petroleum hydrocarbons, lead, total chromium or other hazardous materials and mitigation measures for managing contaminated soils on the site, including, but not limited to: 1) the removal of the contaminated soils; and 2) the specific practices to be used to handle, haul, and dispose of contaminated soils on the site. The project sponsor would be responsible for monitoring the implementation of the SMP and reporting to EHS-HWU.

The mitigation measures identified in the DEIR would ensure that the hazardous materials on the project site would be removed and treated in accordance with regulatory guidelines and that there would be no potential significant hazardous materials impacts associated with the construction of the proposed project.

Comment #131

"The other thing this fails to do is address the serious earthquake danger if approved at this facility. This area that Home Depot is proposed for is built on fill, so I went to the web and looked up what ABAG said about the materials in this particular area. This shaking amplification quality of the ground where Home Depot is being built is extremely high. It is the worst area in San Francisco for this. I would not want to be in this building during a serious earthquake, and I think the DEIR should address that issue." (*John Hayes, Resident*)

"I'm no earthquake expert, but I was standing in my place during the last earthquake. We have a much taller facility than this, with heavy carpets way up high on racks. We had no damage; nothing fell. But, you know, that's only (my) experience." (*Steve St. Denny, Business Owner*)

Response #131

As noted in the Response to Comment #129, the geotechnical report for the project site notes that the project site would be subject to ground shaking in the event of seismic activity (earthquake), and a number of recommendations are made to ensure that the project would be

properly supported on piles, and the foundation would feature a transition or hinged slab to allow for anticipated long term settlement. Moreover, the DBI would require that the project meet all seismic safety codes for construction of the foundation and building of the home improvement store. Potential damage to structures from geological hazards would be mitigated through DBI review of building permit applications pursuant to DBI's implementation of the *San Francisco Building Code*.

CULTURAL RESOURCES

Comment #132

"I am writing to provide comment on the above referenced Draft Environmental Impact Report (EIR). As an environmental engineering professional, I review and prepare environmental information documents. In general, I think the Draft EIR provided a thorough review of the potential impacts of the proposed project with the exception of the cultural resources section.

"I did not have access to the cultural resources evaluation performed by an independent consulting firm as part of the review process, but the summary provided in the Draft EIR did not mention any consultation efforts with representatives of the Ohlone Tribe. The evaluation is deficient if representatives of the Tribe have not been consulted. Considering the site 'should be deemed a zone of high prehistoric/protohistoric archaeological sensitivity,' the proposed mitigation measure is inadequate to identify and protect cultural resources. Although the mitigation measure described in the Draft EIR specifies that ALERT sheets would be circulated to all field personnel working on the site during construction, these individuals are not trained in recognizing archaeological resources. An appropriate mitigation measure would provide for a licensed archaeologist and Ohlone tribal representative to monitor the site during excavation or other ground disturbing activities.

"Consultation with Tribes is an important step in the environmental review process for any construction project, especially when the site has been identified as a sensitive area for cultural resource issues. I would strongly recommend contacting representatives of the Ohlone Tribe and discussing potential mitigation measures with them. They may be able to provide a monitor or have other suggestions that would ensure that any archaeological resources found would be handled in an appropriate manner that is also respectful of the wishes of the Ohlone people. The California Office of Historic Preservation may be able to provide contact information for representatives of the Ohlone Tribe." (*Sara Jacobs, P.E.*)

"What about the cultural impact? No one has spoken of the Ohlone Indians and the artifacts that may exist in that area. Don't we think Native Americans have been harmed enough in this country?" (*Gil Payne, Resident*)

Response #132

The commenters are correct in identifying the importance of Native American participation in the environmental review process. Archeo-Tec, the author of the Archival Cultural Resources Evaluation of the project (summarized on pages 101 to 103 in the DEIR), contacted the California State Native American Heritage Commission (NAHC) during the preparation of the report. The NAHC did not comment regarding the archeological cultural resources or the proposed project. In the event human remains or unassociated funerary objects are discovered on the project site, the NAHC would be notified and, in accordance with *Public Resources Code* Section 5097.98, a Most Likely Descendant (MLD) would be

appointed to work with the project sponsor, the City, and a designated archeological consultant.

Shortly after the DEIR was published, the Planning Department revised the standard archival mitigation measures to include a testing program prior to excavation of a project, and the sponsor has agreed to adopt it. This more stringent and comprehensive measure would ensure that the project's potential impacts on subsurface cultural resources would be reduced to a level of insignificance. This new Cultural Resource Mitigation Measure replaces the measure in the DEIR on pages 15, 16, 109, 110, and A-25 of the Initial Study in Appendix A of the DEIR, and can be found in Section E – Staff-Initiated Text Changes and Errata, from page C&R.365 through C&R.368.

GROWTH INDUCEMENT

Comment #133

"Page 11: No factual basis is provided for the conclusion that induced commercial growth in the area is part of planned growth. There is no approved plan to increase commercial uses in the area; nor has there been environmental review of any such plan (it cannot be assumed that the induced growth has undergone environmental review). The project site is located in an Industrial Protection Zone Special Use District that prioritizes manufacturing, warehousing, and repair services, not retail land uses.

"The Draft EIR finds that the project would not have a significant effect on growth inducement.¹ This finding is inadequate.

"The proposed Home Depot development is intended to be growth inducing, and its impacts as a growth-inducing development need to be studied as part of the EIR. Since the project's application for environmental review, Pier One Imports has lease-optioned a currently undeveloped site adjacent to the proposed Home Depot development on the condition that the Home Depot development is granted approval to build, which demonstrates that without even breaking ground, the project is inducing growth.

"The San Francisco Planning Department and the San Francisco Redevelopment Agency, through the Eastern Neighborhoods Planning and Zoning process and the Survey Area Plan for the South Bayshore Survey Area, have stated an intention to encourage development, including Big Box retail development, along the Bayshore corridor. The Redevelopment Agency has been explicit in its support of the Home Depot proposed development that Home Depot is necessary to anchor and jumpstart further large-scale development along Bayshore.

"The Draft EIR states that the project may induce commercial growth in the area, but such growth would be part of the planned growth for the City. The commercial growth induced by the project, if comparable in size and scope to the project (in aggregate as well as individually), would create impacts on infrastructure far above existing capacity. The possible impacts on infrastructure would include, but are not limited to: traffic, including intersections and freeway on-and off-ramps; traffic flow capacity of 101 northbound and southbound; water and sewer usage; mass transit routing; and emergency services response times. The Draft EIR reference to planned commercial growth provides no citation to a specific plan, so it is impossible to determine which plan is being referenced.

"The San Francisco Redevelopment Agency has been very explicit that they support the project because the project will increase the value of the land on the site, and that the tax increment created by this increase will be earmarked to finance other projects in the Bayview Hunters Point Survey Area. This increase in land value will cause increases in land value throughout the Bayshore IPZ, creating pressures for speculative rent increases for Bayshore businesses, leading to displacement of existing businesses.

"The Planning Department anticipates this displacement in their recommended zoning changes for the Bayshore corridor, contained in the Eastern Neighborhoods Plan. They recommend that Bayshore Boulevard, from U.S. 101 to Loomis Street in one draft, and from U.S. 101 to Barneveld

Street in another, be rezoned to 'Industrial/Large Retail,' a euphemism for more big box retail development.

"Again, the City, through its agencies, have made explicit claims and based significant planning strategies on the basis of their belief that the proposed Home Depot will cause more than equivalent commercial growth, but will induce growth.

"The Environmental Impact Report needs to review and analyze the reports, plans, studies, and recommendations of the San Francisco Planning Department and the San Francisco Redevelopment Agency regarding the Bayshore corridor, and the proposed Home Depot development, including the Bayshore Boulevard portion of the Eastern Neighborhoods Plan, and the Bayview Hunters Point Community Revitalization Concept Plan and related documents to accurately assess whether the project is growth inducing before making a finding." (*Eve Bach, Arc Ecology Consultant; Barbara Kyle, Resident/No Depot Committee Chair; and Ron Morgan, Bernal Heights Neighborhood Center Community Organizing Coordinator*)

¹ DEIR, Section F, page 103.

"I would like to focus on one portion of the DEIR, which is a one-page finding on growth inducement. The draft EIR finds that the project would not have a significant effect on growth inducement. That's on page 103, Section F. This finding is clearly inadequate. The proposed Home Depot development is intended to be growth inducing. Its impact as a growth-inducing development needs to be studied as part of an EIR. Since the project's application for environmental review, it is our understanding that Pier 1 Imports has lease options on a currently undeveloped site immediately adjacent to the proposed Home Depot, on the condition that the Home Depot development is granted approval to build. This demonstrates, without even breaking ground, that the project is growth inducing. The San Francisco Planning Department and San Francisco redevelopment agency, through the neighborhoods planning and zoning process, and the survey area planned for the South Bayshore Survey area, has stated an intention to encourage development, including big-box retail development, along the Bayshore border. The redevelopment agency has been explicitly supportive of the Home Depot proposed development, because it feels Home Depot is necessary to anchor and jump-start large scale development along Bayshore. This is growth inducement, and it needs to be studied in the EIR.

"The draft EIR states that the project may induce commercial growth in the area, but such growth would be part of the planned growth of the city. There is no reference in the draft EIR to a specific plan about this commercial growth, so it is impossible to determine which plan is being referenced. The commercial growth induced by the project, if comparable in size to the scope of the project, would create impacts on infrastructure far above existing capacity. The possible impacts on infrastructure would include traffic intersections; freeway on ramps; traffic flow; impact on water and sewage. I would just ask you, the Planning Department, to look into the growth inducement that is being acknowledged here." (*Ron Morgan, Bernal Heights Neighborhood Center Community Organizing Coordinator*)

Response #133

CEQA *Guidelines* Section 15126.2(d) requires the DEIR to describe and evaluate any growth-inducing impacts of a proposed project. CEQA defines growth-inducing impacts as

"the ways in which the proposed project could foster economic or population growth, or the construction of additional housing, either directly or indirectly, in the surrounding environment. The environmental effects of this growth are considered to be secondary or indirect impacts of the project. CEQA states that "It must not be assumed that growth in any area is necessarily beneficial, detrimental, or of little significance to the environment" (CEQA Guidelines Section 15126.2(d)).

Various factors determine and influence population growth and development in an area. These factors include plans and policies of local communities, counties, special districts, and regional agencies; the existing infrastructure, including the availability of services such as domestic water, wastewater treatment and disposal, fire protection, and public schools; transportation systems capacity; the inventory of developable land; land costs; employment trends; and other economic considerations. Any one of these factors could represent a major, or even singular constraint to development. The removal of an obstacle to future growth could have growth-inducing potential and is considered a growth-inducing impact.

As noted on page 103 of the DEIR in the Growth Inducement section, the proposed project would replace two existing buildings, formerly used for a home improvement and building supply store and a retail home furnishing and supply store totaling approximately 107,400 sq.ft., with an approximately 153,089 sq.-ft. home improvement store and a 539-space parking garage. With the proposed home improvement store and parking garage, the daily population on the project site would increase by approximately 2,500 to 3,300 people.

The project would not provide new infrastructure that could be used to serve other projects, nor would it extend infrastructure into a new area. The project is not providing housing, and the increase in daytime population on the site would largely occur from the existing population in the City and nearby communities. The increases in the population would not tax existing community service facilities, requiring construction of new facilities that could cause significant environmental effects. (See discussion in the Initial Study, Appendix A of the DEIR, on page A-17 regarding the project's potential effect on utilities and public services.) The project would, however, have a significant unmitigable contribution to the Year 2015 adverse cumulative conditions on the various U.S. 101 and I-280 on-ramps, and significant unmitigable project-specific and cumulative impacts on air quality.

The DEIR acknowledges on page 103 that the proposed project would intensify the use of the site and may induce commercial growth in the area. The analysis of the project's potential cumulative impacts on the environment assumed a one percent annual growth rate that would capture any development "induced" by the project. The project is not expected, however, to substantially alter development patterns in the northwest Bayview Hunters Point area or elsewhere in San Francisco. The proposed project would create employment opportunities, but it would not add a significant number of employees to San Francisco's economy.

As Response to Comment #30 notes, the San Francisco Redevelopment Agency's and the Planning Department's efforts for the project area, including the *South Bayshore Area Plan*, the *Concept Plan*, the *Preliminary Redevelopment Plan for the Bayview Hunters Point Redevelopment Area*, and the *Community Planning in the Eastern Neighborhoods, Rezoning Options Workbook First Draft*, entail and plan for commercial use along Bayshore Boulevard. The decision-makers would determine size of the proposed project and extent of the proposed project's conformity or conflict with the various plans. None of these plans encourage large "Big Box" retail use for the project site.

The Board of Supervisors passed Ordinance 89-04 on May 18, 2004, which adds Section 121.6 to the *Planning Code* imposing a Conditional Use requirement for retail uses in excess of 50,000 gross square feet (outside the C-3 zoning districts and 90,000 gross square feet within C-3 zoning districts). However, the proposed project and projects that submitted site permit applications to the Planning Department prior to July 15, 2003 are excluded from the ordinance. The proposed project would be designed to comply with the current zoning and the proposed "area"-type plans, which call for commercial use of the project site and surrounding areas. Therefore, any growth that may be induced or encouraged by the project would be growth that has been envisioned by the applicable plans and policies, and for which adequate infrastructure is planned.

The extent to which the project would displace any existing business is speculative, and if existing businesses were to be displaced, it is not expected that any indirect environmental impacts would occur (see Response to Comment #153), therefore business displacement is not required by CEQA to be addressed in the DEIR.

The Planning Department does not currently have an application for a Pier 1 store to be developed in the project area. Two businesses that have closed in the area, OfficeMax and Carpet Connection, were assumed to be operational as part of the existing baseline setting.

The commenters have not provided any evidence that the project and commercial growth in the area would create impacts on the infrastructure far above existing capacity.

Comment #134

"The Growth Inducement section of the Draft EIR (on page 103 and also in the Summary on page 11) states that the daily population of the store would include 75-100 employees. This estimate should be changed to reflect the fact that the daily population of the store would include approximately 197 employees. This change was calculated as follows:

"Home Depot estimates that store employees would work for a total of approximately 10,080 hours per week, which is similar to the number of hours worked each week at Home Depot's Colma store. Based on the experience of other Home Depot stores, we have assumed in the calculations that the labor force at the store would be comprised of about 60% full time and 40% part time associates. Therefore, assuming that full time employees work, on average, a 40-hour work week (i.e., five 8-hour days) and that part time employees work, on average, 24 hours per week (i.e., four 6-hour days), then approximately 180 full- and 120 part-time employees would work at the store each week, as shown below:¹

180 full time associates x 40 hours per week =	7,200 full time hours per week
+ 120 part time associates x 24 hours per week =	2,880 part time hours per week
300 total associates	10,080 total hours per week

"The revised daily store population of 197 employees per day is based on the following calculations:

7,200 full time hours per week over 7 days = 1,029 full times hours per day
1,029 full time hours per day at 8 hours = 128.5 full time associates per day

2,880 part time hours per week over 7 days = 411 part time hours per day
411 part time hours per day at 6 hours (average shift assumption) = 68.5 part time associates per day

"The sum of 128.5 full-time associates plus 68.5 part-time associates equals 197 associates per day.

"Note that this change in numbers will not in any way affect the assumptions contained in the Draft EIR traffic analysis. The trip generation numbers calculated in the Draft EIR based the number of vehicle trips on the square footage of the store (as derived from other Home Depot stores in California).² Because these numbers are not derived from the projected numbers of employees and customers, the change in the daily employee population does not affect the traffic calculations."
(Anna C. Shimko, Attorney at Law for Home Depot)

¹ Note that because the store is not yet open, these estimates are necessarily approximations, based on information from other comparable Home Depot stores, of the total hours worked per week as well as the potential ratio of full-time to part-time employees.

² See page 3-1 of the Wilbur Smith Associates Transportation Study dated September 17, 2002, on which the Draft EIR transportation analysis is based: 'To determine weekday PM peak hour trip generation, driveway counts were performed at four similar Home Depot stores in California... From the driveway counts, weekday PM peak hour vehicle-trip generation rates on a per square foot basis were developed for each store. To determine the Saturday midday peak hour trip generation, the ratio between the weekday PM peak hour and Saturday midday peak hour driveway counts from the Colma store was determined. This ratio was applied to the weekday PM peak hour trip generation rate to estimate the Saturday midday peak hour trip generation rate.'

Response #134

The comment is noted. As stated in Response to Comment #36, the DEIR is revised to reflect the increased employment figures; however, the change would not alter the transportation and population analyses since the employment projections were within the range analyzed. The conclusions reached in the DEIR would not change.

Comment #135

"And we would need to have on page 103 – we've got a growth inducement report that – I think you might want to take a second look at. We should use that number of employees, which should be accurately reflected in the report. The report utilizes a figure of 3,000 shoppers per day. You want to bolster how you arrive at that number in the final version." (*Kevin Hughes, Planning Commissioner*)

"There's also going to be growth inducement. I don't think that was spoken to enough in the DEIR. If we're going to let Pier 1 come in after this, I don't think that's going to be in any way mitigating to the traffic." (*Rachel Kesel, Resident*)

"Secondly, as a stated growth inducer, there is the potential of other businesses coming, which will further aggravate both traffic and the air pollution." (*Robert Mokry, Resident*)

Response #135

At present, there are no applications to the Planning Department for any new commercial business near the proposed project site. As noted in Response to Comment #133, the proposed project would not have significant growth-inducing impacts, although there could be an increase in commercial businesses along the Bayshore Boulevard corridor that may or may not be "induced" by the project. The DEIR analyses for cumulative impacts assumed a one percent annual growth rate that would account for any new development in the project area. The project would not have a significant growth-inducing impact.

The DEIR analysis of impacts assumed that the daily population on the project site would increase by approximately 2,500 to 3,300 people, and this assumption has not changed. Response to Comment #36 notes that the employment projections have been revised and the change would still be within the range analyzed in the transportation analyses. The estimated numbers were derived from actual counts at other Home Depot stores and adopted for the proposed project.

MITIGATION AND IMPROVEMENT MEASURES

MITIGATION MEASURES

Hazardous Materials

Comment #136

"Pages 13-14 [of the DEIR]: The mitigations of hazard impacts are inadequate. The mitigations calling for the preparation of a revised site mitigation plan and a revised health and safety plan are improperly deferred to the future because they do not specify the performance standards that the plans must achieve.

"The mitigation specified during excavation of contaminated soil, that 'the construction contractor shall be alert' for the presence of heavy metals (lead and chromium) during excavation and other construction activities on the site is ineffective since ordinarily these substances are not discernible visually or by smell. The only way to determine the presence of these contaminants is by systematic sampling.

"The mitigation requires the construction contractor to 'use clean fill or other suitable materials to bring portions of the project site, where contaminated soils have been excavated and removed, up to construction grade.' What are the other suitable materials that would be allowed? Would this mitigation allow the practice of partially refilling excavations with contaminated backfill and covering the contaminated soil with clean soil? This practice should not be allowed." (*Eve Bach, Arc Ecology Consultant; Barbara Kyle, Resident/No Depot Committee Chair; and Ron Morgan, Bernal Heights Neighborhood Center Community Organizing Coordinator*)

Response #136

The Initial Study concluded that the proposed project would not have significant adverse hazardous materials impacts (for further information, see Appendix A in the DEIR, pages A-21 to A-23) and did not warrant further discussion in the DEIR. However, hazardous materials information was included in the DEIR for informational purposes. The DEIR concluded that the proposed project would not have significant adverse hazardous materials impacts. (Discussion is on DEIR pages 9, 10, and 93 to 101.)

There have been 96 samples taken from the soils on the site and analyzed for the presence of hazardous materials. The results of the analyses were reviewed by the San Francisco Department of Public Health, Environmental Health Management Section Hazardous Waste Unit (EHS-HWU) which approved the work plan. On August 9, 2001, EHS-HWU requested that an area where elevated chromium concentrations were found be removed from the

proposed project site and not be included as part of the fill material. The mitigation measures for the potential treatment and removal of hazardous materials are required by law. Those measures listed in the DEIR were developed in accordance with the requirements set forth by local, state, and federal standards. Thus, the mitigation measures are adequate.

The mitigation measures would be included in the Mitigation Monitoring Reporting Program (MMRP), a plan that identifies the process for ensuring implementation of the mitigation measures. The MMRP would contain the following information:

- Who would be responsible for the implementation of the mitigation measures (for the hazardous materials mitigation, the project sponsor and the licensed geotechnical contractor);
- The schedule of the mitigation implementation (for the hazardous materials mitigation, during demolition, excavation and construction);
- The specific action of the mitigation; (the mitigation measures listed in the DEIR [pages 12 to 14, 107 to 109, and in the Initial Study, Appendix A, on pages A-21 to A-23 for procedures related to asbestos and lead-based paint exposure]);
- The responsibility for monitoring the mitigation action (for the hazardous materials mitigation, the project sponsor and Department of Public Health EHS-HWU); and
- The schedule for the monitoring (for the hazardous materials mitigation, during excavation, demolition, and construction).

The hazardous materials mitigation, which would be adopted as part of the conditions of project approval, would be considered complete upon the EHS-HWU's receipt of the final monitoring report at the completion of construction. The hazardous materials mitigation measures in the DEIR assure that the SMP would be implemented.

The project sponsor and construction contractors would be required to observe all state and federal Occupational Safety and Health Administration (OSHA) safety requirements related to potential sources of hazardous substances as a result of activities on and off the site that may have involved handling, storage, or disposal of hazardous substances that could affect the quality of soils or groundwater. As part of the mitigation measure cited above, the project sponsor would provide information regarding the conditions on the project site and present plans to the Department of Public Health and the Department of Building Inspection. All

excavation and clean-up is monitored by the Department of Toxic Substance Control (DTSC). Sampling of soil would be at the discretion of DTSC.

The mitigation measures for hazardous materials are properly stated pursuant to CEQA *Guidelines* Section 15126.4. The performance standards for the SMP and the Health and Safety Plan (HSP) are identified in the *California Occupational Safety and Health Administration Guidelines*, as overseen by the San Francisco Department of Public Health EHS-HWU.

The specific mitigation measure referenced by the commenter does not limit the construction contractor to discerning hazardous materials to sight and smell. The measure (stated on page 108 of the DEIR) states that "the construction contractor shall be alert for the presence of such soils during excavation and other construction activities on the site (detected through soil odor, color, and texture and results of on-site soil testing.)"

The mitigation related to soils replacement under the category of Handling, Hauling, and Disposal of Contaminated Soils on page 108 in the DEIR does not specify what other suitable materials would be beyond clean fill. The DEIR on page 100 notes that in a letter dated August 9, 2001, EHS-HWU requested that the area where elevated chromium concentrations were found be removed from the site and not be included as part of fill material. The decision on suitable fill material would be made by the Department of Public Health EHS-HWU when it approves the HSP.

Comment #137

"Page 14 [of the DEIR]: One of the hazard mitigations potentially requires the project sponsor to record a deed notice even though Home Depot is not the property owner.

"It is not clear what protection would be offered by recording a notice on the deed warning about contamination since a notice does not represent a proprietary interest in the property that can enforce any limitations on use. It is also unclear whether the project sponsor even would have the authority to implement this mitigation since Home Depot will be leasing the site. This site appears to qualify as a State Superfund site that should be cleaned up under the supervision of the California Department of Toxic Substances Control." (*Eve Bach, Arc Ecology Consultant; Barbara Kyle, Resident/No Depot Committee Chair; and Ron Morgan, Bernal Heights Neighborhood Center Community Organizing Coordinator*)

Response #137

The commenter refers to an identified action as part of the hazardous materials mitigation measure that calls for the project sponsor to record a notice against the title for the proposed project site that indicates the need to take special precautions during future disturbance of the soils on the property due to certain on-site soil conditions if potentially hazardous levels of petroleum hydrocarbons, lead, total chromium or other hazardous materials associated with gas and oil facility were to remain in soils on the project site after project construction. The project sponsor can be required by the City to record such notice (or to cause the property owner to record the notice) as a condition of building permit issuance. Such notice would ensure that all future tenants and/or owners of the site are fully apprised of site conditions.

The California Department of Toxic Substances Control's (DTSC) Site Mitigation and Brownfields Reuse Program oversees the cleanup of State Superfund Sites. State Superfund sites are also called Annual Workplan sites, listed sites, or Cortese List sites. These are sites with evidence of a hazardous substance release or releases that could pose a significant threat to public health and/or the environment. DTSC issues orders to responsible parties to compel the clean up of these sites. Where no responsible parties can be found or where they do not take proper and timely action, DTSC may use State funds to undertake the cleanup. If necessary, emergency actions may be taken.⁵⁹ As noted on pages 93 to 101 in the DEIR, the project site is not an abandoned or uncontrolled hazardous waste site. The hazardous materials mitigation measures listed on pages 107 through 109 in the DEIR would ensure that the hazardous materials on the project site would be removed and treated in accordance with regulatory guidelines and that there would be no potential significant hazardous materials impacts associated with the proposed project.

Cultural ResourcesComment #138

"Page 15 [of the DEIR]: The mitigation for impacts to cultural resources recommended by the cultural resource consultant has been omitted from the DEIR which provides a less protective mitigation.

⁵⁹ http://www.dtsc.ca.gov/SiteCleanup/Brownfields/BF_FS_IS&E_11-04.pdf.

"Page 102: The DEIR recommends 'a systematic program of pre-construction archaeological testing' but does not include it as the recommended mitigation.

"The study on cultural resources submitted to the EIR consultant (Stu During) by the cultural resources consultant (Allen Pastron) recommends as a mitigation 'a systematic program of preconstruction archaeological testing and evaluation.'¹ However, the DEIR proposes as mitigation that 'the project sponsor shall distribute and Planning Department archaeological resource ALERT sheet to the project prime contractor...' instructing those excavating the site to be on the lookout for artifacts. No explanation is offered in the DEIR for the rejection of the recommended mitigation of sampling. The EIR should require the Pastron mitigation." (*Eve Bach, Arc Ecology Consultant; Barbara Kyle, Resident/No Depot Committee Chair; and Ron Morgan, Bernal Heights Neighborhood Center Community Organizing Coordinator*)

¹ Allen Pastron, Archeo-Tec, Inc. "Archival Cultural Resources Evaluation of the Proposed 491 Bayshore Boulevard/196 Loomis Street Home Depot Project, City and County of San Francisco, California," May 2002, page 37.

Response #138

Please refer to Response to Comment #132 and Section E – Staff-Initiated Text Changes and Errata, pages C&R.365 through C&R.368, for the revised Cultural Resources Mitigation Measure. This measure replaces the mitigation measure found in the DEIR on pages 15, 16, 109, 110, and in the Initial Study on page A-25, Appendix A of the DEIR, and requires the project sponsor to retain an archeological consultant who would develop and implement an archeological testing program specified in the mitigation measure. This measure corresponds to the recommendations made by the cultural resource consultant.

IMPROVEMENT MEASURES

Transportation

Comment #139

"Additional mitigation measures and a traffic improvement program should be included." (*Charles M. Abrams, President, Abrams Associates*)

"I think we need to look at the entire report, and especially for traffic mitigation. That's a very important area that has to be addressed." (*Michael Antonini, Planning Commissioner*)

"Page 11, D. Mitigation Measures, indicates project's contribution to the adverse conditions on Mission/Cortland would be significant by the year 2015, but doesn't discuss how the project sponsor will address these improvements if the City will not or cannot implement the improvements." (*Shelley Bradford Bell, Planning Commission President, written comments*)

"Improvement conditions to the project as identified on page 110 are inadequate and merit further discussion. Additional improvement measures may be necessary to address traffic, including improvement of additional intersections such as Oakdale/Loomis where truck traffic will access the truck entry and at Boutwell/Loomis which may be another access direction.

"The project sponsor indicates the project will have an adverse effect on traffic by year 2015, but doesn't indicate the project sponsor's commitment to funding improvement conditions. Project sponsor assumes the cost of future improvements will not be borne by the project sponsor, but by the City. Improvement conditions should discuss how the project sponsor will address these improvements if the City will not or cannot implement the improvements. (*Shelley Bradford Bell, Planning Commission President, written comments and oral testimony*)

Response #139

As noted in the DEIR on page 106, the proposed mitigation measure at the intersection of Mission/Cortland would be implemented by a public agency. DPT has confirmed that the proposed measure is feasible and has requested that the full cost of this measure be paid by the project sponsor.⁶⁰ The project sponsor has agreed to pay the full cost of this measure. The following sentence is added to the end of the first paragraph on page 106 in the DEIR:

"The project sponsor would pay for the costs of this measure."

As discussed in the Transportation Study, the project sponsor would be responsible for funding the study, design, construction, and installation of all improvements to the intersection of Bayshore/Cortland (see page 110 in the DEIR). Since the project was not considered to have a significant contribution to the poor 2015 Cumulative intersection operating conditions at the intersection of Bayshore/Silver, the project sponsor would not be responsible for funding any improvements to the intersection (see page 111 in the DEIR). However, the project sponsor has agreed to pay for the improvement measure at this intersection.

The Planning Commission, however, may recommend additional improvement measures as conditions of approval for the project.

The Transportation Study prepared by Wilbur Smith Associates did not identify any additional improvement measures that are warranted by or are required for the project. Under Existing plus Project conditions, the project would not result in impacts to the study

⁶⁰ Letter from Bond Yee, Director of the Department of Parking and Traffic to Tim Erney, Wilbur Smith Associates, September 7, 2004, op cit.

intersections of Oakdale/Loomis or Industrial/Loomis/Boutwell, including from trucks. At these locations, vehicles and trucks destined to and from the project would not significantly impact intersection operations. In addition, although the project would have a significant contribution to the poor 2015 Cumulative operating conditions at the analysis freeway on-ramps, no feasible mitigation measures have been identified. As such, the project's significant contribution would be considered a significant unavoidable impact.

As discussed on page 70 of the DEIR, the proposed parking garage would be able to accommodate the peak parking demand on most weekdays and weekends. Although there may be times when there would be a parking shortfall (due to the effective capacity of the parking garage and on peak days), there are currently sufficient on-street parking spaces available in the nearby project vicinity. Overall, the project would not be considered to have a significant parking impact.

Comment #140

"In regards to the traffic improvements (see illus. p. 63 [in the DEIR]), I would suggest an entrance to the Home Depot from Bayshore Boulevard without an exit onto Bayshore Boulevard. The exit from Home Depot should be on Waterloo Street, with a left turn only. This would direct traffic away from Bayshore Boulevard, and create a possibility whereby cars turning left on Waterloo would have an option to subsequently turn left towards Oakdale, or right towards Industrial. These are two thoroughfares which are quite capable of handling the volume of traffic that will be anticipated. Having traffic exit at Waterloo would also ameliorate the concerns of the Bernal Heights community by preventing cars from directly exiting Home Depot onto Cortland. Also, by having an entrance only at Bayshore Boulevard, you will be able to create a left turn in two lanes, with the middle lane giving drivers the option of turning left or continuing on through Bayshore. This would reduce the queue lines turning left into the Home Depot. Drivers would also retain the ability to drive into the Home Depot parking lot directly from Cortland, using more than one lane, also reducing queue lines on Cortland.

"I don't know if my suggestions are far too late to give impact, but regardless, I do believe the proposed setup as currently written in the draft report does not maximize the use of available streets in limiting traffic backups. I have only skimmed the impact report, but feel this issue warranted immediate attention." (*Jim Rodriguez, sf-pt.com*)

Response #140

Additional analysis was conducted for different access plans for the project and is documented in Response to Comment #74. One of the plans analyzed included the primary entrance at Bayshore/Cortland and the primary exit at Loomis Street (referred to as Option A). The difference between this plan and the one proposed by the commenter is that Option

A only provides a single left-turn pocket from southbound Bayshore Boulevard into the project site instead of a left-turn and a shared left-through lane, and an exit onto Loomis Street instead of Waterloo Street. Based on the results of the analyses of the alternatives, a second left-turn lane would not be necessary from southbound Bayshore Boulevard into the project site. If the exit driveway was located on Waterloo Street, vehicles exiting the site would still need to make a right-turn or left-turn onto Loomis Street. Also, Waterloo Street is relatively narrow, and therefore cannot accommodate the substantial increase in traffic volumes. Providing access directly to Loomis Street would be preferable. As discussed in Response to Comment #74, the potential Option A would not result in any new significant impacts over those identified with the proposed project.

Comment #141

"Page 16 [DEIR]: The DEIR does not evaluate potential environmental impacts of the proposed transportation 'improvements' that have been incorporated into the project. The DEIR proposes improvements to Bayshore Boulevard that would reduce the center separation and shorten the bus pull-out. Reducing the center separation could increase risk of vehicle collisions. The reduced bus pull-out would increase hazards for transit riders (especially the disabled) since it would encourage bus drivers to load and unload passengers from a traffic lane, rather than at the curb. Furthermore, it appears that the shortening of the bus stop is inconsistent with policies 11.1 and 14.3 in the 'Transportation Element' of the *San Francisco General Plan* that prioritize transit."¹ (*Eve Bach, Arc Ecology Consultant; Barbara Kyle, Resident/No Depot Committee Chair; and Ron Morgan, Bernal Heights Neighborhood Center Community Organizing Coordinator*)

¹ Transportation Element Policy 11.1: Maintain and improve the Transit Preferential Streets program to make transit more attractive and viable as a primary means of travel. The Transit Preferential Streets program includes measures to improve transit vehicle speeds and to minimize the restraints of traffic on transit operations.

Response #141

The San Francisco *General Plan* classifies Bayshore Boulevard as a Secondary Transit Street; Cortland Avenue is not classified. Under the *General Plan*, secondary Transit Streets are considered to have medium transit ridership and low- to medium-frequency of service, or medium frequency of service and low- to medium-transit ridership, or connect two or more major destinations. For these types of streets, recommended treatments should be low-cost and geared to solving a specific transit problem.

To improve operations and safety at the eastbound approach of Cortland Avenue to Bayshore Boulevard, it was proposed by the project sponsor that the approach be restriped to provide two travel lanes. However, this change would require the centerline between the eastbound and westbound directions to be located about 4 feet to the north, so that 24 feet would be provided in the eastbound direction and 16 feet would be provided in the westbound direction (as noted on pages 16 and 110 in the DEIR). In addition, the Muni bus stop along eastbound Cortland Avenue would be shortened. As noted in Response to Comment #63, DPT has determined that this improvement measure would not be feasible;⁶¹ therefore, the improvement measure would not be incorporated into the proposed project, and no changes to the configuration of Cortland Avenue would be implemented.

On pages 16 and 110 in the DEIR, the first transportation improvement measure is deleted, and the second sentence of the improvement measure introductory paragraph is revised: "~~These~~ **The following** measure would be implemented by the Department of Parking and Traffic and the cost of ~~the first measure~~ would be borne by the project sponsor."

Refer to Response to Comment #63 regarding potential improvements at the intersection of Bayshore/Cortland.

Comment #142

"'Improvements' Please show on graphic renderings with dimensions all of the proposed modifications to traffic lanes, bulbs, changes to Muni stops, changes to pedestrian islands, and other similar changes. Changes to timing of signals also needs to be shown, so that the time of various phases – and the number of cars who can get through turns on turn phases – can be understood. Do a 'before' and 'after' to make it more accessible. Either on that graphic, or on a separate graphic, show traffic volumes at peak periods, separating out expected turn lanes. Show the anticipated volume of pedestrian traffic across those lanes – both in the street and at all access points for Home Depot.

"Will it still be possible for pedestrians to stand on the mini-traffic island in Bayshore? What about parents with small children? Seniors? Disabled persons?" (*Sue C. Hestor, Attorney at Law, on behalf of Cole Hardware*)

⁶¹ Ibid.

Response #142

The improvements identified as part of the project are shown on Figure 2 – Site Plan in the DEIR on page 28. The specific engineering dimensions of the improvements have not been developed and will be coordinated with the Department of Public Works, DPT, the Planning Department, Muni, ISCOTT, and other appropriate City agencies. The actual timing of the signal phases will be formalized pending additional analysis by DPT to ensure the appropriate coordination and synchronization with the adjacent inter-sections. Any potential alterations to the anticipated lane striping, roadway configuration, and signal timing would likely be minor and not affect the results of the transportation analysis in the DEIR.

With the establishment of the new left-turn pocket from southbound Bayshore Boulevard to the Bayshore/Cortland driveway, the existing pedestrian refuge island, located in the median on the north side of the intersection, would be eliminated (note that the island on the south side of the intersection would remain). In addition, there would be a substantial increase in the number of vehicles crossing the crosswalks, which would increase the potential for conflicts between vehicles and pedestrians. The new traffic signal at Bayshore/Cortland would be designed to allot sufficient pedestrian signal time to allow safe crossing of Bayshore Boulevard. Since the Cortland Avenue approach and the proposed project garage exit approach would have separate phases, the amount of crossing time would substantially increase (from about 30 seconds currently to about 43 seconds during the weekday PM peak hour and 61 seconds during the Saturday midday peak hour). As a result, pedestrians would be able to safely cross Bayshore Boulevard even though the island at the north side crosswalk would be eliminated. It should be noted that pedestrian WALK/DON'T WALK signals with countdown indicators, which indicate when it is safe for pedestrians to cross both Bayshore and Cortland Streets, have recently been installed at this intersection. Overall, pedestrian conditions with the proposed project would not substantially worsen, since the increase of potential conflicts and the elimination of the refuge island would be offset by the longer pedestrian crossing times.

In addition, it may be possible to construct sidewalk bulbs at several of the corners, which would further improve pedestrian conditions. The purpose of these bulbs would be to shorten the distance pedestrians would need to cross and to enhance the visibility of pedestrians, which would further improve pedestrian conditions. The project sponsor would work with

DPT regarding the potential installation of sidewalk bulbs at the intersection of Bayshore/Cortland. It should be noted, however, that installations of sidewalk bulbs may conflict with the provision of the proposed new bicycle lanes.

Also see Response to Comment #87 for additional discussion on pedestrian conditions at the intersection of Bayshore/Cortland.

Comment #143

"The scope of mitigation measures set forth in the Draft EIR is appropriate for the project. As you know, any prescribed mitigation measures must be both reasonably linked to the impacts of the project, and 'roughly proportional' to the impacts of the project (see CEQA Guidelines § 15126.4(a)(4)). The Draft EIR sets forth a comprehensive list of the project's impacts, and then provides mitigation measures that accurately and adequately address those impacts.

"Some comments to the Draft EIR claim that the mitigation measures are not sufficient, primarily with respect to the improvements required to mitigate traffic impacts. In fact, many traffic improvements were proposed as part of the project itself, including pedestrian improvements and the addition of two turn lanes at the intersection of Bayshore and Cortland (see pages 62-65 of the Draft EIR). The incorporation of these improvements rendered the project essentially 'self-mitigating,' with the result that the project will have minimal traffic impacts. Also, although not required to alleviate significant project impacts, Home Depot would fund the traffic improvement measure suggested in the Draft EIR (page 110) for improving the eastbound approach of Cortland Avenue to Bayshore Boulevard.¹" (*Anna C. Shimko, Attorney at Law for Home Depot*)

¹ As the Draft EIR indicates (page 110), the project would not significantly contribute to cumulative conditions at the Bayshore/Silver intersection, so cannot be required to fund the improvement measure for that intersection.

Response #143

The comment is noted. No further response is required. The project sponsor has agreed to implement all the mitigation measures listed in the DEIR on pages 106 to 111, including funding the study, design, construction, and installation of all improvements to the intersection of Bayshore/Cortland. It should be noted, however, that DPT determined that the proposed restriping of the eastbound approach would not be feasible; as such, this element will not be implemented (see Response to Comment #63 for discussion). In addition, the project sponsor has committed to fund the implementation of the signal timing changes at the intersection of Mission/Cortland, as needed to improve future 2015 Cumulative intersection operations, and to pay for the improvement measure at the intersection of Bayshore/Silver (even though the proposed project would not result in a significant impact at this location).

Comment #144

"I work as the organizing coordinator of the Bernal Heights Neighborhood Center. When we and others requested the Planning Commission require Home Depot to submit to a full environmental impact review, we had hoped that the resulting EIR would outline the very significant impacts of the project, and suggest a suitable mitigation program. Unfortunately, the draft EIR published in March of this year does not come close to doing this, and if it were up before you today I would ask you to reject it. The draft EIR on Home Depot is a Trojan horse. It states the project will have a minimum of impact, and offers to pay for a minimum mitigation program. Hidden inside are the real impacts and real costs of mitigating. The question the Commission must ask is this: If Home Depot is allowed to avoid paying to mitigate its impacts, who will? The answer is the City of San Francisco and the taxpayers." *(Ron Morgan, Bernal Heights Neighborhood Center Community Organizing Coordinator)*

Response #144

The DEIR was prepared in accordance with the CEQA regulations and guidelines which require the identification of potentially significant impacts and mitigation measures that would lessen or minimize the impacts. The project sponsor would bear the cost of those mitigation measures over which they have direct responsibility for implementation on the project site. For those measures for which the City has responsibility for implementation such as the transportation improvements on Bayshore Boulevard, the Department of Public Works and the Department of Parking and Traffic would determine the amount of additional costs to the project sponsor.

Comment #145

"I am a traffic engineer, a transportation planning consultant – and working with Cole Hardware and Sue Hestor on this project. I'm also on the City Council, and have been on the Planning Commission in Walnut Creek. I have reviewed the EIR very thoroughly, in addition to all the traffic studies that accompany it, and I must admit that what really struck me the most when I looked at the final result of this was the mitigation measures that are being put on Home Depot's part of this project. There are three mitigation measures mentioned in the report. One is to change the signal timing at Cortland and Bayshore; there's another one to remove the central line striping over six feet to make some new lanes. There is also a left-turn arrow would that be put in at Bayshore and Silver. And I think the extent of these mitigations don't in any way match up with the traffic and the issues that are being developed as a part of this Home Depot. This project will generate, as has been said, about a thousand vehicles per hour, and that's typical of most of the big-box stores that are in that range of 800 to 1200. Consider that a lane of traffic on the freeway carries about 2,000 cars per hour, so this project is the equivalent of adding another half a lane of traffic on the freeway, or even a full lane of traffic on Bayshore Boulevard. Now admittedly it is not all in the same place at the same time, but the overall impact is of that magnitude. The City of San Francisco is really, I think, missing the boat on this area when it comes to having these kinds of developers having to pay their fair share. I note

the City does have, certainly, the intent to have new development pay its fair share of the impacts that they create. This is not happening with this project. An equivalent project in some of the suburban locations would have traffic impact pay, for example, that might be \$3,000 per peak-hour trip that might amount to \$5 to \$8 million towards traffic improvements that go in to support this project.

"As a project that generates 12,000 vehicles per day, with about 1,200 vehicles during the peak hour, it is simply amazing how little traffic impact will be created. The only mitigations that have been proscribed are some very minor traffic signal adjustments, and some pavement marking changes. In fact, these mitigations should be routinely taken care of by the City Public Works staff. Given the impact of this project, the City should have Home Depot be responsible for improving the traffic conditions on Bayshore Boulevard, and bringing traffic equipment up to current standards. This means modern traffic signals, improved turn lanes at signalized intersections, and improved pedestrian controls at each of the signalized intersections." (*Charles M. Abrams, President, Abrams Associates*)

Response #145

As noted in Responses to Comments #139 and #144, the project sponsor would pay for all transportation mitigations and the improvement measure proposed as part of the project. The Planning Commission could require additional mitigation measures for project-generated impacts. The transportation analysis in the DEIR examined the proposed project's contribution to the levels of service at key intersections near the project site and no adverse significant impacts were identified that could not be mitigated. The impacts were assessed and mitigation measures proposed for all identified impacts, including the commenter's suggested measures of more modern traffic signals, improved turn lanes at signalized intersections, and improved pedestrian controls at the signalized intersections.

Comment #146

"I don't think that Home Depot's mitigation requirements are strong enough. I think that they should pay for them, not the City. If this is a transit-first commission, then I think you should really be representing people such as myself, who are trying to reduce air pollution by taking bicycles and utilizing Muni. SamTrans will also be affected." (*Rachel Kesel, Resident*)

Response #146

The cost for mitigation measures listed in the DEIR related to air quality, construction, hazardous materials, archeological cultural resources, and transportation impacts would be largely borne by the project sponsor. As noted previously, the City would be responsible for implementing the mitigation measure at the intersection of Mission/Cortland, however the project sponsor would bear the full cost of this measure.

The project is required to provide 26 bicycle spaces, per the San Francisco *Planning Code*, and would provide 28 bicycle spaces, to be located on the ground floor of the parking garage. In addition, the project would also provide shower and locker facilities for employees. These facilities would serve to encourage and accommodate bicycling and walking to and from work by employees.

According to the project sponsor, transit subsidies are not one of the benefits provided to employees at Home Depot. However, the project sponsor would consider other means to encourage the use of alternate modes of travel, including reserving preferred parking spaces on the upper levels for employees who carpool.

ALTERNATIVES

Comment #147

"Pages 115-127: The DEIR does not evaluate the alternatives against the City's objectives for approval. See comment [#12 of this document]." (*Eve Bach, Arc Ecology Consultant; Barbara Kyle, Resident/No Depot Committee Chair; and Ron Morgan, Bernal Heights Neighborhood Center Community Organizing Coordinator*)

Response #147

The objectives listed in the DEIR on page 25 are the project sponsor's objectives. The alternatives were selected in accordance with CEQA requirements (CEQA Guidelines, Section 15126.6(a)) to analyze reasonable alternatives that would minimize the potential significant impacts. As stated in Section 15126.6(a), the lead agency determines the range of alternatives to study. Alternatives analyzed in the DEIR are generally selected on the basis that they could attain most of the basic project objectives, but they need not be able to attain all of them. The analysis in an EIR should focus on alternatives that can eliminate or reduce significant environmental impacts even if they would impede attainment of project objectives to some degree or be more costly (CEQA Guidelines Section 15126.6(b)). Alternatives in the DEIR were identified on the basis of having fewer impacts than the proposed project. As long as the project proposed is a home improvement store, the only alternatives that could reduce its environmental impacts are variations in size and configuration, and these variations are discussed in the Alternatives section of the DEIR. It should be noted that the feasibility of alternatives, as well as mitigation measures, is determined by the lead agency. (Also see Response to Comment #12 for CEQA guidelines regarding the aegis of project objectives.)

Comment #148

"Unclear what base data are -- 3,000 customers a day (seems light) or some other figures from Traffic Study." (*Chris Witteman, Resident*)

Response #148

The customer estimates for the various alternatives were extrapolated from the data developed for the proposed project. The Transportation Study estimated the amount of vehicle-trips generated by the project during the weekday PM and Saturday midday peak

hours based upon project size (as is customary for traffic analyses), and did not rely on daily customer estimates.

Comment #149

"Page 17 [of the DEIR]: The sources of information on the alternatives are not documented and information gaps do not fully allow for a thorough comparison. The table below [Refer to Appendix E of this document, Eve Bach, Barbara Kyle, and Ron Morgan Letter dated July 24, 2003] shows information provided by the EIR, including the Transportation Study. No sources are cited for the estimates of trip generation or people brought to the site. In addition, there are gaps in information about Alternative B (vehicle trips, parking spaces, employees and shoppers), Alternative C (employees and shoppers), and Alternative E (vehicle trips). Since the EIR concludes that each of these has fewer unmitigable impacts, it would appear prudent for the analysis to provide full information on each so that assumptions can be reviewed.

"The most troubling data gap is the missing information about vehicle trips per day for the project and for Alternative E. The only alternatives with information about daily vehicle trips are C and D (with no indication of the source of these numbers), and for both the peak hour rate represents about 8 percent and 12 percent of the daily rates for weekdays and weekends, respectively. These ratios appear to be high, given the long hours that Home Depot is open for business (with multiple shifts) and the likelihood that a significant proportion of its customers are contractors who would be most likely to arrive during business hours, especially in the morning. The EIR needs to make the data underlying these estimates available to the public to review with time to comment.

"Another problem suggested by the data is an apparent undercounting of employees, achieved apparently by limiting the total to permanent employees. News releases about Home Depot stores elsewhere in the nation suggest that the company typically employs many more workers per square foot than the 75-100 shown for the San Francisco project. For example, the 84,000-square foot new store (with a 19,000-square foot garden center) planned for Sault Ste. Marie in Manitoba plans on hiring 164 full-time equivalent workers.¹ The DEIR must explain how the number is calculated of employed persons – both full-time and part-time – on the site on an average daily basis.

"Will Proposed Alternatives Really Bring Less Traffic? The DEIR discusses two slightly smaller alternatives – a 107,400-square foot store and a 140,000-square foot store – suggesting that this slight reduction in size would reduce the traffic enough to avoid some of the traffic problems of the larger store. This is an underhanded manipulation of some basic formulas used to project vehicle trips. It suggests that some number of people considering shopping there will decide not to go because it is not big enough. The City must find a way to estimate what basic threshold of demand will exist for any Home Depot of any size." (*Eve Bach, Arc Ecology Consultant; Barbara Kyle, Resident/Home Depot Committee Chair; and Ron Morgan, Bernal Heights Neighborhood Center Community Organizing Coordinator*)

¹ *The Sault Star*, "Home Depot hopes to nail down deal in Sault," April 25, 2003.

Response #149

Pages 116 through 127 of the DEIR present the results of the alternatives analysis to the proposed project. Five alternatives were assessed for transportation impacts: Alternative A – no project; Alternative B – variant no project, which includes the reuse of the existing buildings on the site, providing about 107,400 sq.ft. of retail space; Alternative C – a 60,000-square-foot Home Depot store; Alternative D – a 107,400-square-foot Home Depot store; and Alternative E – a 140,000-square-foot Home Depot store. The rationale on how the alternatives were developed is described in the DEIR on page 115.

For each of the alternatives (except the No Project alternative), the travel demand associated with the project, in terms of the weekday PM peak hour and Saturday midday peak hour vehicle-trip generation, was determined..

Because Alternative A is the No Project alternative, no additional transportation assessment was conducted. There would not be any new vehicle trips traveling to and from the project site, and therefore no impacts related to this alternative were discussed.

Alternative B assumed reuse of the existing buildings on the project site by general retail uses, other than a Home Depot store. As such, different trip generation and mode split rates were used to determine the travel demand of the alternative, instead of the rates developed for the proposed project. The San Francisco Planning Department has established standard trip generation rates for retail establishments and mode split rates for retail uses in the southeastern quarter of the city (as documented in the *Transportation Impact Analysis Guidelines for Environmental Review* – October 2002). The trip generation rates in the Transportation Guidelines include both employee and visitor trips. Since the Transportation Guidelines do not provide trip generation rates for weekends, the ratio between weekday and weekend rates for Alternative B were approximated from the ITE *Trip Generation* manual for the use most similar to that proposed for Alternative B (shopping centers – land use #820). It should be noted that the mode split rates from the *Transportation Impact Analysis Guidelines for Environmental Review* were adjusted to shift about five percent of the visitor trips from transit to autos, to account for the reduced transit service available at the project site, as compared to the rest of this portion of the City (Superdistrict 3, which is the southeast quadrant of the City and includes the Potrero Hill, Bayview Hunters Point, Little Hollywood,

Visitacion Valley, Excelsior, Bernal Heights, Mission, Castro, Noe Valley, Twin Peaks, Diamond Heights, and Glen Park neighborhoods). Most residents of Superdistrict 3 live in the vicinity of the major transit corridors along Church/Valencia/Mission Streets or Third Street. Because the transit service near the project site is less than along these areas, it has been assumed that the transit mode split would be lower.

Alternative C, Alternative D, and Alternative E would all include a Home Depot store, but with different total square footages. As a result, it was assumed that each alternative would have the same vehicle-trip generation rate as the proposed project (5.54 trips per 1,000 square feet during the weekday PM peak hour and 8.28 trips per 1,000 square feet during the Saturday midday peak hour), since they would all contain the same land use, but varying number of trips generated due to variations in square footages. For the proposed project and the alternatives, the trip generation rate for the project was based on actual driveway counts conducted at similar Home Depot stores throughout California, as described in the DEIR on page 57. Since these rates were based on the actual number of vehicles entering and exiting Home Depot stores, they account for all employee and customer trips. It was assumed that the employee and customer profile of the project would be similar to the other stores surveyed.

For most land uses, the travel demand is based on a trip generation rate, which represents the number of trips per 1,000 square feet of use. In general, the number of employees and the visitor activity at an establishment are directly correlated to the size of an establishment. As such, it was assumed that Alternative C, Alternative D, and Alternative E would have the same trip generation rate (number of trips per 1,000 square feet) as the project.

Since the Home Depot trips rates were developed for the weekday PM and Saturday midday peak hours only, the weekday and Saturday daily trips were derived from trip generation rates contained in the ITE Trip Generation manual for a "Home Improvement Superstore" land use (#862). From this data, it was estimated that the weekday PM peak hour represents about 8.2 percent of weekday daily trips, and the Saturday midday peak hour represents about 11.8 percent of Saturday daily trips.

Table C&R.20 below presents the number of vehicle-trips generated by each alternative for the weekday PM and Saturday midday peak hours.

Table C&R.20 Comparison of Trip Generation for Proposed Project and Project Alternatives					
		Weekday		Saturday	
Scenario	Size	Daily Vehicle-Trips	PM Peak Hour Vehicle-Trips	Daily Vehicle-Trips	PM Peak Hour Vehicle-Trips
Proposed Project	153,100 sqft	10,360	848	10,718	1,268
Alternative B	107,400 sqft	6,136	552	8,222	789
Alternative C	60,000 sqft	4,059	332	4,202	497
Alternative D	107,400 sqft	7,266	595	7,521	890
Alternative E	140,000 sqft	9,480	776	9,796	1,159

Source: Wilbur Smith Associates, January 2004

Alternative B would generate about 35 percent fewer vehicle-trips than the proposed project during the weekday PM and Saturday midday peak hours. Alternative C, Alternative D, and Alternative E would generate about 60 percent, 30 percent, and 10 percent fewer vehicle-trips than the proposed project during the weekday PM and Saturday midday peak hours, respectively.

Since Alternative B would not contain a Home Depot store but a general retail establishment, the parking supply is not known. However, it was assumed that it would meet the *San Francisco Planning Code* requirements for the provision of off-street parking, which would equal about 347 spaces.

Page 117 of the DEIR, first paragraph, line seven, is revised to read: "It is assumed that the buildings would comply with building codes and the *San Francisco Planning Code* requirement for the provision of off-street parking (which would equate to 347 spaces)."

The parking supply associated with Alternative C, Alternative D, and Alternative E was based on information provided by the project sponsor (350 spaces, 385 spaces, and 500 spaces, respectively, as indicated on pages 121, 123, and 125 of the DEIR), and was based on the relative size of each store in order to meet the *Planning Code* requirement for off-street parking.

The DEIR text has been revised to clarify the trip generation and parking supply information associated with the project alternatives.

On page 117, the second paragraph, fourth line, is revised to include the total daily vehicle trips generated by the alternative and percentage comparison with the proposed project: **"This Alternative B would generate about approximately 6,136 weekday daily vehicle-trips and 552 PM peak hour vehicle-trips; in the weekday PM peak hour and approximately 8,222 Saturday daily vehicle-trips and 789 midday peak hour vehicle-trips in the Saturday midday peak hour, compared to proposed project's 848 weekday PM peak hour trips and 1,268 trips in the Saturday midday peak hour (about a 35 percent reduction from the proposed project)."**

On page 122, the second paragraph, second line is revised to clarify the peak hour and correct the percentage comparison with the proposed project: **"The Alternative C would generate approximately 4,059 weekday daily vehicle-trips and 332 PM peak hour vehicle-trips, and about approximately 4,202 Saturday daily vehicle-trips and 497 midday peak-hour vehicle-trips, compared to proposed project's 848 weekday PM peak hour vehicle trips and 1,268 vehicle trips in the Saturday midday peak hour (an approximately forty 60 percent reduction in the vehicle trips generated by from the proposed project).**

On page 124, the first paragraph, third line, is revised to clarify the peak hour and the percentage comparison with the project alternative: **"Alternative D would generate approximately 7,266 weekday daily vehicle-trips and 595 PM peak hour vehicle-trips, and approximately about 7,521 Saturday daily vehicle-trips and 890 midday peak hour vehicle-trips, compared to the proposed project's 848 weekday PM peak**

~~hour vehicle trips and 1,268 vehicle trips in the Saturday midday peak hour (about a 30 percent reduction from the proposed project).~~

On page 126, the second paragraph, line one, is revised to clarify the peak hour and the percentage comparison with the proposed project: "Alternative E would generate approximately **9,480 weekday daily vehicle-trips and 776 PM weekday peak hour vehicle-trips**, and **approximately 9,796 Saturday daily peak hour vehicle-trips** and about 1,159 Saturday midday peak hour vehicle-trips, ~~compared to the proposed project's 848 weekday PM peak hour vehicle trips and 1,268 vehicle trips in the Saturday midday peak hour (about a 10 percent reduction from the proposed project).~~"

Comment #150

"Page 18: The DEIR incorrectly claims that it has applied a trip generation rate to Alternative B that is consistent with Planning Department Guidelines.¹ To justify the estimated vehicle trips for Alternative B, the footnote states it is 'Based on an estimate of 13.5 person trips per 1,000 sq. ft. of retail space for weekday PM peak hour, and 19.3 person trips per 1,000 sq. ft. of retail space for Saturday midday per the San Francisco Planning Department, *Interim Transportation Impacts Analysis Guidelines for Environmental Review*, January 2000.'

"However, the DEIR converts this person-trip estimate to peak-hour vehicle-trips with the assumption that there will be 2.6 people in each vehicle – a number that seems too high for both the weekday and weekend peak.

"The person-trip rate calculated for Alternative B that is misrepresented as complying with Planning Department Guidelines, relies on an overly high assumption of persons per auto, considering that a high proportion of the trips, especially during the week, will be made by a single person – often a professional contractor. The DEIR then applies a slightly higher trip generation rate to the project and the other alternatives, creating the false impression that a trip generation rate used for the project and those alternatives exceeds the Guidelines. However, if a reasonable, but still high, ratio of persons per vehicle is applied (e.g., 1.75 on weekdays, 2.00 on weekends), the trip rates used in the DEIR for the project and Alternatives C, D, and E are actually lower than those in the Guidelines." (Eve Bach, Arc Ecology Consultant; Barbara Kyle, Resident/No Depot Committee Chair; and Ron Morgan, Bernal Heights Neighborhood Center Community Organizing Coordinator)

¹ DEIR, footnote 2, page 18.

Response #150

Alternative B includes the development of a 107,400 sq.-ft. retail store instead of a Home Depot store. The travel demand associated with Alternative B was based on trip generation

and mode split rates provided in the San Francisco Planning Department's *Interim Transportation Impact Analysis Guidelines for Environmental Review*, published in 2000, which states that general retail uses have a trip generation rate of 150 person-trips per 1,000 square feet on a weekday, and 13.5 trips per 1,000 square feet during the weekday PM peak hour.⁶² Since the Transportation Guidelines do not provide trip generation rates for weekends, the ratio between weekday and weekend rates (for both daily and peak hour conditions) was estimated from the ITE *Trip Generation* manual for shopping center uses (land use #820), which would be the closest comparable land use to Alternative B. According to ITE, shopping centers have about 34 percent more activity on a Saturday than on a weekday, and about 43 percent more activity during the Saturday weekday peak hour than the weekday PM peak hour.

Since these trip generation rates are person-trips (and not vehicle-trips, as with the project), the trips were assigned to the various travel modes (auto, transit, walk, and other) using the mode split rates in the Transportation Guidelines. Although the Transportation Guidelines include different mode split assumption for various parts of the City, the visitor mode split rates for the southeast quarter (where the project site is located) were adjusted to account for the reduced transit service available at the project site compared to the rest of this portion of the City. Under Alternative B, the Transportation Guidelines estimated that about 71 percent of employees would travel via private automobile, with an average vehicle occupancy of 1.28 persons per vehicle. Under Alternative B, the Transportation Guidelines (with the previously mentioned adjustments) estimated that about 71 percent of visitors would travel via private automobile, with an average vehicle occupancy of 1.89 person per auto. It is unclear how the commenter determined an average vehicle occupancy of 2.6 persons per vehicle was used in the analysis. As indicated above, an average vehicle occupancy of 1.28 or 1.89 was used, based on the data contained in the Transportation Guidelines.

Overall, it was estimated that Alternative B would generate about 552 vehicle-trips during the weekday PM peak hour and 789 vehicle-trips during the Saturday midday peak hour, as

⁶² The analysis was prepared prior to the availability of the current Transportation Guidelines, which were published in October 2002. However, the current Transportation Guidelines did not contain any changes that would affect the analysis of the project, and therefore does not change the analysis contained in the Transportation Study or DEIR.

documented in the DEIR on page 117. These totals are about 35 percent lower than the vehicle-trip generation for the proposed project.

Comment #151

"Page 20 [of the DEIR]: It is not clear why 2,775 (maximum) shoppers and employees in Alternative D would generate 7,339 trips per day. The DEIR estimates that there would be 50-75 employees and 2,400-2,700 shoppers per day – a maximum average of 2,775 people on-site; the weighted average of vehicle trips per day is 7,339, based on 7,226 on weekdays and 7,521 on weekends. An explanation is needed of the reason why each person would make 2.6 times per day on average." (*Eve Bach, Arc Ecology Consultant; Barbara Kyle, Resident/No Depot Committee Chair; and Ron Morgan, Bernal Heights Neighborhood Center Community Organizing Coordinator*)

Response #151

Alternative D includes a 107,400-square-foot Home Depot store, about 30 percent smaller in size than the proposed project. Since the alternative would have the same land use as the project, the travel demand and parking demand of the project was reduced by 30 percent to represent the travel demand and parking demand of Alternative D (see DEIR page 123). In general, the travel demand and parking demand of land uses are directly proportional to the size and use of a land use. For the proposed project, trip generation rates and parking demand rates were developed based on the square footage of the Home Depot store.

The trip generation for the proposed project was based on actual driveway counts conducted at similar Home Depot stores throughout California, as described in the DEIR on page 57. These rates were based on the actual number of vehicles entering and exiting Home Depot stores, and they account for all employee and customer trips, regardless of the number of sales transactions on a daily basis. While the number of trips per shopper of 2.6, as calculated by the commenter, may seem high, the trip generation rate accounts for all employee trips (travel to and from work, lunch, errands), and patrons arriving and departing.

Comment #152

"The real issue before you is an evaluation of the other proposed alternatives. Can any smaller project still be fully mitigated? At what cost to the immediately adjacent communities, the city, and the developer? Before you deliberate this decision, we would ask that you be mindful of the impact upon our friendly, artsy, diverse, liberal... small town within the big city. The friendliness and familiarity of our locally owned neighborhood-serving businesses are a source of pride in our association. We are re-emerging into a 'go to' neighborhood, with new restaurants and businesses." (*Michael Grafton and David Ayoob, Co-Presidents, Cortland Merchants Association*)

"I read with interest in today's *Chronicle* that the Planning Department is looking for ways and places to build more housing in the city. Why not build a combination residential and commercial development along Bayshore Boulevard? This could serve the surrounding communities (Bernal Heights and Bayview Hunters Point) much better, and would not create the kind of environmental disaster that the proposed giant Home Depot would create. In addition, the 26 small home supply businesses that have served the city for many years could be preserved." (*Rosanne Liggett, Resident*)

"And I also feel that the EIR is really trying to push the largest – that they have three options of development, and they are trying to push the biggest one. They might want to look at the 60,000-square-foot in more detail – which is more in the nature and scale and character of the area." (*Gretchen Mokry, Resident*)

"And lastly, I don't think anyone has a problem with Home Depot per se, just specifically with this project. I'm aware they have, and are developing, 60,000-square-foot smaller box projects in other tight, congested urban areas, and I would be very in favor of a project of that means. And I think that will be in keeping with the San Francisco pride of promotion of neighborhood merchants. A huge big box is inconsistent with history and area." (*Robert Mokry, Resident*)

"Home Depot believes that the alternatives analysis set forth in the Draft EIR includes a reasonable range of alternatives to the proposed project, as required by CEQA Guidelines § 15126.6. While it may have been useful for informational purposes to include a 60,000 square foot store as an alternative (Alternative C, Draft EIR page 121), that option is not by any means a feasible alternative, so cannot be selected in lieu of the proposed project. While there are certain locations in the United States where Home Depot has home improvement stores ranging in size from 50,000 to 80,000 square feet, these stores do not carry the full range of Home Depot items for urban home improvement and do not feature lumber supplies, a garden center or home decorating services. Moreover, these stores are within a five to ten minute drive to full-sized Home Depot stores. Likewise, the 60,000 square foot alternative included in the Draft EIR would not be able to offer Home Depot's complete range of home improvement services, and the nearest Home Depot stores are at least half an hour away by car so they are too far away to rely on for support services. The 60,000 square foot alternative would not meet the following of Home Depot's objectives: to provide a wide range of home improvement goods and services within the City and County of San Francisco; to satisfy the home improvement supply needs for both do-it-yourself customers and local contractors; to provide a source of substantial sales tax revenue to the City and County of San Francisco; to stem sales tax leakage from the City and County of San Francisco to cities where full-service home improvement centers currently exist; to provide new job opportunities for San Francisco residents (particularly residents of the Bayview Hunters Point neighborhood); to site a new full-service Home Depot in a location that will relieve over-crowding at the Home Depot in Colma; and to make it possible for San Francisco residents who currently shop at the Colma Home Depot to shop closer to home.

"Not only does the 60,000 square foot alternative fail to meet Home Depot's objectives for the site, it is unlikely to meet *any* prospective retailer's objectives for the site. The proposed location for the store previously hosted two businesses (Goodman's Lumber and Whole Earth Access) that occupied approximately 107,346 square feet of space. Whole Earth Access's predecessor at the site was apparently a lumberyard that likely took up even more space. Given the industrial nature of the area, the types of home improvement businesses that are located along Bayshore Boulevard and the costs

to acquire and develop land in the area, it is infeasible to place such a small building on the site (and Home Depot, which has the right to occupy the project site for the next 50 years, would not consider doing so)." (*Anna C. Shimko, Attorney at Law for Home Depot*)

Response #152

Alternative C includes a 60,000-square-foot Home Depot store, about 60 percent smaller than the proposed project. Since the alternative would have the same land use as the project, the travel demand and parking demand of the project was reduced by 60 percent to represent the travel demand and parking demand of Alternative C (see DEIR pages 121 through 123).

On page 122 of the DEIR, the first paragraph, second line is revised to clarify the peak hour and correct the percentage comparison with the proposed project: "The Alternative C would generate approximately 4,059 weekday daily vehicle-trips and 332 PM peak hour vehicle-trips, and about **approximately** 4,202 Saturday daily vehicle-trips and 497 midday peak-hour vehicle-trips, ~~compared to proposed project's 848 weekday PM peak-hour vehicle-trips and 1,268 vehicle-trips in the Saturday midday peak-hour~~ (an approximately ~~forty~~ **60** percent reduction in the vehicle-trips generated by **from** the proposed project)."

As described in the DEIR, Alternative C would generate substantially fewer vehicle-trips than the project. As a result, Alternative C would have a reduction in vehicle delays at the local intersections, as compared to the proposed project. In addition, the intersection operating conditions would be better than with the project, and the levels of congestion at the key intersections studied would be less than with the proposed project. However, in common with the project, this alternative would still have significant unmitigable contribution to the 2015 cumulative conditions on the 101 Freeway on-ramps with the exception of the northbound U.S. 101 on-ramp at Bayshore Boulevard/Cesar Chavez Street which would be less-than-significant.

Decision-makers could adopt any of the alternatives instead of the proposed project, if an alternative would reduce or eliminate the significant environmental impact of the proposed project and were determined to be feasible and would attain most of the basic objectives of the project.

VII. COMMENTS AND RESPONSES
ALTERNATIVES

A combination of mixed residential and commercial development would not meet the project sponsors' objectives, and the project area is zoned for industrial and commercial use and not residential use. In addition, such an alternative could well have greater impacts to the environment than the proposed project due to a 24-hour per day residential use on the site, and thus would not meet the directive of CEQA to consider alternatives that would decrease the significant impacts of the project.

OTHER ISSUES

BUSINESS DISPLACEMENT

Comment #153

"My concern also was around the area of the impact on related businesses. I raise the issue particularly about the AAA Rental store that's near there. I found the information about the other impacts on other businesses, and the leakage, as well as the projected capture rate through the Home Depot sales, but it did not speak to the issue of how that particular business would be impacted. And it is immediately behind that area. So I'll be concerned about that. It probably would not be that horrific, but it does bear some concern and some consideration." (*Rev. Edgar Boyd, Planning Commissioner*)

"Smaller merchants (Cole Hardware) will be pushed out of business by a Home Depot." (*Mae Chesney, Resident*)

"I am a manager of a small business in San Francisco that's Cole Hardware, and I cannot believe that people are not paying attention to the fact of how much small business would be lost because of Home Depot coming in. People need to be more aware of that. The beauty of San Francisco, and as a resident for 15 years, is that there are small neighborhoods, and they've got cute little coffee shops and the hardware store and all this. This will all be gone. Mainly the cool little hardware store will be gone because of Home Depot, and Home Depot will bring in the other stores. Home Depot is an anchor, and they will bring other stores, which will make these little neighborhoods not be able to be in business, as most of them can't afford rent. How can they afford to compete with these big boxes? And by the way, for all the people that do not know where to go shop except Home Depot, come to me. I'm on 29th and Mission." (*Linda Cook, Business Owner*)

"I fear that a lot of wonderful companies will be forced out of business." (*Chava Nieto, Resident*)

"I am concerned that, if Home Depot comes in on Bayshore, other mega-stores will follow, and it will affect the business climate of our neighborhood, i.e., putting smaller stores out of business." (*Marci Yellin, Resident*)

Response #153

See Responses to Comments #24 and #28 for a discussion of the issue of the potential economic impacts by the proposed project on other home improvement and hardware stores in San Francisco. A report commissioned by the project sponsor (Exhibit C to a letter submitted by Anna Shimko, in Appendix E of this document) provides information on city-wide home improvement supply sales and the potential capture by the proposed project and other stores in San Francisco. The Sedway report was updated on February 17, 2005, which concluded that San Francisco continues to lose home improvement sales dollars to

surrounding communities and that the proposed project could help to reverse this trend.⁶³ This report was also reviewed and the findings corroborated by another independent economic consulting firm.⁶⁴ Based on the conclusions reached in the studies, any potential economic impacts from the proposed project are unlikely to cause environmental impacts. While it is possible that certain retailers may close and properties may have difficulty being re-tenanted with retailers, market demand for housing and retail space is generally strong, and commercial and industrial space demand is also projected to increase in the future. Therefore, the introduction of the proposed project is not likely to result in long-term vacancies that can lead to urban decay in San Francisco.

PROPERTY VALUES

Comment #154

"The proposed development will have substantial undesirable consequences. The project will increase land values in the area, causing significant conditions for displacement of existing PDR businesses. The Draft EIR neglects to cite San Francisco Redevelopment and San Francisco Planning Department studies and planning documents on land value appreciation anticipated due to the project, its impacts on surrounding properties, and the impacts of land appreciation on lease holding existing PDR businesses." (*Eve Bach, Arc Ecology Consultant; Barbara Kyle, Resident/No Depot Committee Chair; and Ron Morgan, Bernal Heights Neighborhood Center Community Organizing Coordinator*)

"We have friends on the east side of Cortland who would consider selling their house due to the noise coming from the traffic and the Home Depot store (delivery trucks, moving merchandise, etc.).

"What will this do to the property value of my home?" (*Alyson Jacks, Resident*)

"And I don't think that is very good for our property, taxes, or our property values. [W]ith respect to land use and economic impact, I'm not averse to Home Depot. In fact, my entire back yard comes from Home Depot. But let's remember what Goodman's was. Goodman's was service; Goodman's was a very good local citizen. I wonder if Home Depot is going to do the same.

"With respect to tax basis, I tell you that if you do this my home value will depreciate. If my home value depreciates, you have less property taxes coming from me. Combined with tax breaks that you will give to Home Depot and other big-box stores, do you think that you will have more income coming into the City in terms of tax revenues or less? I hope you have less – and it will have a bad impact on California and San Francisco in the future." (*Gil Payne, Resident*)

⁶³ Sedway Group, *Economic Impacts of Proposed San Francisco Home Depot Store*, February 2005, op. cit.

⁶⁴ Economic and Planning Systems, *San Francisco Home Depot Study Peer Review*, June 22, 2005, op. cit.

"I am a writer, teacher, Bernal Heights homeowner since 2000, and parent of two children in the San Francisco public schools. My husband, Lenny Carlson, is a musician who also teaches music at City College of San Francisco and San Francisco State University. We spent well over a year in 1999-2000 seeking a house we could afford to buy in San Francisco's extremely inflated real estate market. When we bought a fixer on Cortland Avenue in south Bernal Heights in the fall of 2000, we were well aware that we were moving into one of the very last of the marginally safe and affordable family-friendly neighborhoods in all of San Francisco.

"Even though housing prices have since dropped somewhat, our realtor has told us that our home's value has held steady, both because of the repairs we have made and because the neighborhood has continued its slow but steady upturn. Take a drive onto Cortland these days, and you'll see scaffolding up in front of many storefronts. New shops and restaurants open every couple of weeks. Walk down these same streets, and you'll experience the pride both long-time and newer residents have in their neighborhood.

"The neighborhood is not without problems. Increased traffic on Cortland and surrounding streets led the City more than a year ago to being a 'traffic calming' study; plans for implementing the resulting recommendations are still being worked out. High youth unemployment and petty and more serious crime are among the problems the area continues to face.

"However, it's a neighborhood well worth investing in – not just for homeowners like my husband and myself, but also from the point of view of City Hall. Why? Because Bernal Heights could easily become an example of what's right about San Francisco: small, extremely diverse, affordable, welcoming, family-friendly neighborhoods that encourage people to put down roots and build community. We invested in Bernal Heights for much the same reason we have invested so many hours, so much in the way of fund-raising efforts, and so much heart in our children's public school, Claire Lilienthal: because we believed that consistent effort, added to what was already a wonderful, established community, would build a neighborhood of great value and benefit to all its residents.

"The Home Depot store in Colma, a scant 10-minute drive from our home even in traffic, is located just where it should be: in an area where it does not impact residential neighborhoods, and where parking and freeway access are a breeze. It's not in an area where the increased traffic and resulting poor air quality would directly affect young children and their parents, contributing to childhood asthma and other respiratory problems, long delays commuting to and from family homes and businesses, ongoing traffic noise well after bedtimes, an increased number of traffic accidents and certainly pedestrian injuries and fatalities, and a degraded overall quality of life in a neighborhood so well known for just that: quality of life.

"A number of national polls have recently claimed that San Francisco is unfriendly to families – citing overpriced housing, struggling school quality, unevenly maintained parks and public facilities, among many other issues. Add to this a city government administration that is committed to business-friendly practices even when they completely overrun the needs of neighborhoods, and you will accelerate the flight from the city of exactly those citizens most committed to staying put and building a life there.

"If Home Depot moves into our neighborhood, with all of its intractable attendant problems, with the obvious probability of destroying the many smaller competing home improvement businesses on Bayshore, with its management's refusal to guarantee work for the low-income residents of neighboring communities, who as always will suffer the most from both the construction and the operation of this unwanted behemoth on their doorstep: our family's and our neighbors' quality of

life will suffer, our home will [have] lost substantial real market value, and we'll ultimately forget our dream of a decent neighborhood in which to raise our family in San Francisco.

"Thank you for your attention. I hope you think hard before you act to so certainly damage the jewel of a strong, productive neighborhood that is Bernal Heights with the giant footprint that Home Depot is certain to represent." (*Lisa Rosenberg, Resident*)

Response #154

The proposed project is a permitted land use in the M-1 Zoning District and is compatible with other nearby land uses, such as the adjacent masonry supply warehouse to the north; the large equipment rental company to the east; the building supply warehouse to the south; and various one- and two-story industrial buildings, home supply stores, and retail warehouses to the west. The proposed project would replace the former Goodman Lumber and Whole Earth stores. Neither the Planning Department nor San Francisco Redevelopment has produced studies or planning documents on land value appreciation or depreciation anticipated due to the proposed Home Depot project.

In determining the significance of environmental effects caused by a project, *CEQA Guidelines* Section 15064(f) states that the decision as to whether a project may have one or more significant effects shall be based on substantial evidence in the record of the lead agency. *CEQA Guidelines* Section 15064(f)(5) states: "*Argument, speculation, unsubstantiated opinion or narrative, or evidence that is clearly inaccurate or erroneous, or evidence that is not credible, shall not constitute substantial evidence. Substantial evidence shall include facts, reasonable assumptions predicated upon facts, and expert opinion supported by facts.*" Moreover, *CEQA Guidelines* Section 15131(a) states that economic and social effects of a project shall not be treated as significant effects on the environment, although they may be used to determine the significance of physical changes caused by the project. Also see Responses to Comments #24 and #28 concerning the economic effects of the project.

Comment #155

"Members of the public have raised concerns over potential economic effects of the Home Depot store on other home improvement businesses in San Francisco. We attach as Exhibit C to this letter a copy of the Economic Impact Report dated January 2002, which was prepared by the Sedway Group to examine the fiscal impacts of the proposed Home Depot store. [Refer to Appendix E of this document, Anna C. Shimko Letter dated July 11, 2003.] This study finds the demand by San Francisco residents for building materials to be so enormous that the existing businesses within the

City fall well short of meeting it. Sedway estimates that San Francisco currently loses approximately \$250 million each year in building materials sales, while the proposed store is expected to average about \$45 million in building materials sales. Thus, even with the addition of the Home Depot store, the Sedway Group estimates that San Francisco would still lose over two hundred million dollars a year of potential building materials sales to stores outside the City limits. Because San Francisco residents would demand far larger amounts of building materials than the new store could possibly supply, the other home improvement stores in the City would clearly continue to succeed.

"In fact, as shown by newspaper articles from areas all over the country (attached as Exhibit D to this letter), the opening of a new Home Depot store has often – contrary to pre-opening fears of nearby home improvement stores – actually led to the increased success of such stores. [Refer to Appendix E of this document, Anna C. Shimko Letter dated July 11, 2003.] This is due not only to excess demand for home improvement wares within the region, but also to the synergy between Home Depot's broad spectrum of merchandise and the more specialized service and product lines offered by the smaller stores. As the articles discuss, in many instances, residents and businesses alike have welcomed new Home Depot stores into their communities because they anticipated – and received – numerous economic benefits from Home Depot's presence.

"While economic or social information can be included in an EIR, '[e]conomic or social effects of a project shall not be treated as significant effects on the environment.' CEQA Guidelines § 15131(a). Economic and social changes are only relevant under CEQA if they will cause physical changes that would result in significant impacts, e.g., if the project would result in the closure of numerous businesses whose buildings would not be reused, thus causing physical blight. Plainly, here, there is not a shred of evidence to suggest that such a convoluted course of events would occur, and the evidence in the Economic Impact Report shows that the opposite will occur, i.e., that other home improvement businesses in San Francisco will thrive." (*Anna C. Shimko, Attorney at Law for Home Depot*)

Response #155

The comment is noted and no further response is required.

Comment #156

"Please show on one map the parcels in the immediate area of Home Depot and their ownership. One of the applicants for this project is Joan Goodman Zimmerman. She owns many of the lots/blocks around this site, including those east of Loomis and south of Waterloo. As an applicant, Ms. Zimmerman should be required to provide the following information under oath:

"Any discussion she has had with potential buyers or tenants on those parcels, particularly if there has been any sort of written agreement. Nature of business, size proposed.

"Ms. Zimmerman also has financial stakes in several home improvement businesses, which will be competitors to Home Depot. She has already acted in a manner that resulted in closing her family's business, Goodman Lumber. She owns land on which a lumber yard is/has been located across from the Home Depot site. How much longer is there on that lease? What are her intentions regarding continued operation of that business? Ms. Zimmerman is also part (1/3) owner of Discount Builders on Mission across from the Planning Department. Does she contemplate allowing that business to continue? Please provide information on any financial stake in a home improvement business in San Francisco." (*Sue C. Hestor, Attorney at Law, on behalf of Cole Hardware*)

Response #156

The parcels and their ownership in the immediate area of the proposed project is information that is beyond the scope of the environmental impact analyses and has no direct relevance to the analyses of physical impacts of the proposed Home Depot project (see CEQA *Guidelines* Section 15131). The names and addresses of the owners of record of parcels in San Francisco are public information available at the San Francisco Assessor's Office.

PROJECT SPONSOR EMPLOYMENT PRACTICES

Comment #157

"I certainly recognize my blessings: I have a good job, I'm able to live in San Francisco, on Cortland Avenue and enjoy the 'small town' of Bernal Heights. Home Depot has promised jobs. Many of my friends need jobs, many people in Bayview and Hunters Point need jobs. But, I must ask, at what cost? These will be minimum wage jobs – minimum wage is not a living wage, especially in this city, which is one of the two most expensive in the U.S." (*Kathy Allen, Resident*)

"Home Depot will not hire or build their stores with union labor, they do not support our local unions." (*Jean Fontana, Resident*)

"The Bayview district isn't even thrilled with the plan anymore, due to lack of job guarantees." (*Phoebe Grigg and Jim Miglino, Residents*)

"Scoping: This EIR scoped out the issue of Utilities/Public Services - 'substantially increase demand for schools, recreation, or other public facilities.' Home Depot and WalMart are the two dominant big box retailers. Both of them are so anti-union that they have no unionized facilities. Both of them manipulate the hours of their work force so that most workers are part time and do not have enough hours to earn benefits.

"The Chronicle reported on a recent study done by a Southern California city where a WalMart was proposed to be built. The study analyzed the shift to City/County coffers of the responsibility for medical and social services for underpaid, uninsured workers. Costs that, instead of being borne by the employer, were put on the City.

"Home Depot has many stores in the Bay Area. Please require the following information:

- " How many total employees in 2002?
- " How many of them worked an average of 35 hours a week?
- " How many hours have to be worked for an employee to get health insurance?
- " Do they provide transit passes or otherwise subsidize transit usage by their employees? Do they provide free parking for their employees?
- " How many hours have to be worked to get full employee benefits?
- " What average weekly income for persons in lowest 20%, next 20%, middle 20%, next 20%, highest 20%?

"Using that information, the City should estimate how much of the cost of health services will be borne by the City.

"Both Goodman and Whole Earth employees were relatively well compensated and had access to health care. Compare to this non-unionized large corporation." (*Sue C. Hestor, Attorney at Law, on behalf of Cole Hardware*)

"I am very concerned about the union jobs that we are going to lose. And also the smaller compan[ies] that are located on Bayshore that we are going to lose once Home Depot is built.

"And I'm a professional truck driver; I drive a truck for a living. I have been driving a truck since 1965. The job there is going to be lost. People don't realize since I have been driving our membership in Local 85 has probably dropped – it was about 5,000 to 8,000 thousand members, and now there's maybe 600 members. We're talking local people here that are born and raised, and it is unbelievable for people to think that Home Depot is going to come in and help them, and put them back to work, and stuff like this. It is just not going to happen." (*Bill Nieto, Resident*)

"I also want to talk to you about jobs. There are lots of fallacies and a lot of false statements from the City about jobs in the community. The Metreon is a prime example. They promised our community jobs, jobs, jobs and they said, 'Oh, yeah, we're going to give you jobs at Metreon.' At the South of Market Employment Center, this year we placed two folks in the community into jobs, because the Home Depot people and – such as Metreon and so on and so forth – they have not been accountable to the community. They say, 'Yes, we're going to train folks and give them jobs; give them opportunities.' It is just a fallacy. For them to make false statements is pathetic; it is pathetic." (*Roy Recio, Resident*)

"I am also concerned about Home Depot's poor treatment of employees and the loss of job opportunities for underprivileged youth, as smaller businesses get edged out far beyond the Bernal neighborhood." (*Ken Shelf, Resident*)

"I'm a lover of San Francisco, an avid bike rider, and also a lover of Bernal Heights. I'm not against business; I'm a business person. I have worked for many years in business industry, working with people in service, and one of the things that I want to address – regardless of the impact on my neighborhood, and on Cortland Avenue, as some of these issues have been repeated: One of the things we need to look at, if you are looking for jobs for people, is quality of those jobs, and the impact it is going to have on the lives and the residents of the City of San Francisco. What kind of living wage are they going to have? What kind of benefits are they going have? This is something that, you know, if you are going to have these big boxes coming in, such as the Wal-Marts and the K-Marts and the Home Depots, look at the quality that they have." (*Rick Shelton, Resident*)

"I don't like what I've learned about Home Depot's business practices. They have not promised jobs to local folks and they don't provide their employees with a living wage or sufficient benefits." (*Marci Yellin, Resident*)

Response #157

As noted in Response to Comment #36, approximately 180 full- and 120 part-time employees would work at the store each week, for an average count of 128.5 full-time employees and 68.5 part-time employees (a total of 197 daily employees).

A project sponsor's employment practices do not constitute physical environmental impacts under CEQA and thus are not required to be addressed in an EIR. For informational purposes, the project sponsor has provided the following information regarding its employment policies⁶⁵:

- All Home Depot employees are eligible for health benefits (with some employee contribution), no matter how many hours they work or whether they are considered to be "full-time" or "part-time" employees.
- Starting salaries at the proposed store would average \$11 to \$13 per hour for employees with no experience, which is higher than San Francisco's Minimum Compensation Pay Rate applying to larger for-profit employers (\$10.77 per hour), and also higher than the Federal Minimum Wage (\$5.15 per hour) and California's Minimum Wage (\$8.50 per hour). Employees with extensive experience in a trade may be eligible to receive a higher starting salary.
- The San Francisco store is expected to provide a total of approximately 300 jobs, of which 200 jobs would be filled by new retail employees. Home Depot has committed to comply with the City's First Source hiring program (see Community Commitments in Appendix G of this document, pages G-4 and G-5). The project sponsor would use good faith efforts to hire residents of the Bayview Hunters Point neighborhood to fill at least 100 of these 200 new jobs. Home Depot has further committed to using good faith efforts to hire residents of the Potrero Hill, Visitacion Valley, Bernal Heights, Excelsior, and Mission neighborhoods to fill at least 50 of these 200 new jobs. Home Depot has also committed to contract with one or more community-based organizations to implement a training program aimed at enabling Home Depot to reach these hiring goals. The project sponsor has additionally committed in the Community Commitments agreement to use good faith efforts to ensure that at least 50 percent of the person-hours spent to construct the store are performed by residents of San Francisco, with at least half of that (25 percent of the total person-hours) being performed by residents of the Bayview Hunters Point area.
- Home Depot would provide free parking to its employees in the parking garage of the proposed store.

⁶⁵ Letter to Tammy Chan from Anna Shimko, March 23, 2004. This letter is available for public review by appointment at the San Francisco Planning Department, 1660 Mission Street, Fifth Floor, San Francisco as part of Case File 2001.0062E.

AVAILABILITY OF INFORMATION

Comment #158

"The other large problem with this EIR that I would like to bring to your attention is that almost all of the data that has been used is not available to the public. We have requested of the Planning Department that we be permitted to review the data – almost all of which comes from Home Depot – and have not been allowed to do that during the review period – which means that we can't really comment on it during the review period. This is a serious problem, and I think will require you to extend the review period." (*Eve Bach, Arc Ecology Consultant*)

"I have just one question for staff: A couple of the speakers raised the issue of the accessibility of the data underlying the draft EIR, and said that they have been unable to obtain that documentation." (*Lisa Feldstein, Planning Commissioner*)

Response #158

All information cited in the DEIR has been and is currently available for review by the public. Copies of referenced reports are available for public review by appointment in Case File 2001.0062E at the Planning Department, 1660 Mission Street, Fifth Floor, San Francisco.

PUBLIC HEALTH

Comment #159

"The DEIR does not address the health impacts of increased congestion and loss of a pedestrian-oriented focus to the adjacent neighborhoods.

"It is well established that walkable cities are healthy cities. Loss of pedestrian access and quality in an urban environment contributes to social isolation, reduction in civic engagement, increased obesity, and related health problems such as diabetes, and many other adverse effects.

"The huge Home Depot project will have significant adverse effects on the pedestrian quality of the Bernal Heights neighborhood that cannot be mitigated by the largely cosmetic changes being suggested. This can be anticipated to have significant, adverse effects on the health of the community. These are the kinds of effects that the Planning Department is supposed to prevent." (*Amy D. Kyle, Ph.D., M.P.H., Resident*)

Response #159

The proposed project would not cause a loss of pedestrian-oriented focus to the neighborhoods as noted on pages 70 and 71 in the DEIR under pedestrian impacts. The commenter is correct in noting that there would be increased potential for conflicts between

vehicles and pedestrians with the proposed project. However, as discussed in detail in Response to Comment #87, the transportation mitigation and improvement measures proposed as part of the project would increase the amount of time pedestrians have to cross Bayshore Boulevard and the Bayshore/Cortland driveway. The new pedestrian signals with countdown indicators that were recently installed also help allow pedestrians to safely cross Bayshore Boulevard.

The potential public health impacts of the proposed project as related to air quality are addressed in the DEIR Air Quality section on pages 81 to 92. Responses to Comments #115 to #126 also address air quality issues and the health impacts of vehicle emissions including asthma and other respiratory afflictions.

The ambient air quality standards addressed in the DEIR are intended to protect public health and welfare, and they incorporate an adequate margin of safety. They are designed to protect those segments of the public most susceptible to respiratory distress, known as sensitive receptors. The Bay Area Air Quality Management District (BAAQMD) defines sensitive receptors as facilities where children, the elderly, the acutely ill, the chronically ill, and persons engaged in strenuous work or exercise are likely to be located. These land uses include residences, schools, playgrounds, child care centers, retirement homes, convalescent homes, hospitals, and medical clinics. The nearest sensitive receptor is the Montessori School located at 240 Industrial Street at the northeast corner of Loomis Street, about 300 feet south of the project site. Healthy adults can tolerate occasional exposure to air pollution levels somewhat above ambient air quality standards before adverse health effects are observed.

The proposed project would exceed the BAAQMD established threshold of significance of 80 pounds per day for emissions of reactive organic gases (ROG) and would be considered to have a significant adverse environmental effect on air quality. This significant impact would occur within the region-wide area (the multi-county air basin) and would not be reflective of local conditions in San Francisco. The proposed project would not have a significant effect on the local levels of CO in the project area.

Based on modeling for what is believed to be the worst-case location (as discussed in the DEIR on page 90), project impacts related to local toxic air contaminants would be well below the BAAQMD thresholds of significance and would be less-than-significant.

OTHER CONCERNS

Comment #160

"I'm the president of the Bernal Heights Neighborhood Center, and a 14-year resident of Bernal Heights. I am here to voice my serious concerns, and to raise questions about the draft of the EIR. Just by looking at the map, it is clear that Bernal Heights is the residential and commercial area that will be most affected by the environmental changes brought about by the proposed project. Since today's main focus is the environment, including the traffic impacts, the air quality and land use, it is my sincere hope and my strong request that our concerns in Bernal Heights be taken as the most important and substantive issues before you today. In previous meetings we have been portrayed as Nimby's and anti-growth. That is just not so. We do want development along the Bayshore corridor; we do understand that San Francisco needs a strong economic tax base; and we do want to create meaningful jobs for San Franciscans, especially for those in Bayview Hunters Point. We do want to ensure that air quality will not be compromised, and any other large project in the future will not compromise this. And we certainly want and will be involved in all aspects of the land use development along the Bayshore corridor. What we don't want is unregulated growth without thought and careful analysis of traffic concerns, air quality, and that lack community input. We don't want to create traffic patterns that choke our streets, foul our air, and impede our local commercial enterprises.

"We don't want to support corporations that give empty promises of employment. We don't want to support big-box corporations that exploit their workers; cause local businesses to go bust; and do not make significant and meaningful contributions to the surrounding neighborhood. Bernal Heights is undergoing its own revitalization. Over the last ten years we have seen a flurry of small business development that has enhanced all of our lives in Bernal Heights. I'm talking about the bank; restaurants; grocers; book stores; churches; coffee houses; flower shops; nail salons; boutiques and all the myriad number of services that make up our neighborhood, and contribute to the unique character of Bernal Heights. The viability and survival of these small businesses must be protected and taken into consideration when we develop the Bayshore. We in Bernal Heights have been involved in the Home Depot project for over two years, and we expect that this process will continue for the foreseeable future. Let me state that we will continue to provide oversight of all aspects of any development; we will continue to advocate for our neighbors and small businesses, to protect our quality of life and economic development. We will see this process through; we will be in every meeting, and we will raise questions that require serious answers. What is at stake here is the very quality of our daily lives, and no negative impact will go left unchallenged." (*Larry Cruz, President, Bernal Heights Neighborhood Center*)

"I am the executive director of the Bernal Heights Neighborhood Center, and I am also a resident of Bernal Heights and a native San Franciscan – and glad to be part of this struggle and discussion and debate around the development of Home Depot. We have been fighting this development for the past

27 months, and I first want to say, you know, my parents still live on 30th and Noe, and we always took Cortland to get to Goodman's Lumber and Whole Earth Access. That has been our short-cut forever, and that's what we use, and what a lot of people will use. We never proposed to have a mixed-use development with Home Depot and housing on top. We took a survey back in April of 2001, and over 400 residents responded, and 75 percent of those residents were against a Home Depot proposal, and wanted another commercial use with the possibility of housing on top. We also did meet with Home Depot back as recent as last May. We have had our ears and eyes open and willing to listen, and nothing really changed with their latest proposal except the driveway on the back side of Loomis. It is still as big as it is, 150,000 square feet, the biggest in the nation. It will impact our community negatively." (*Mauricio Vela, Executive Director, Bernal Heights Neighborhood Center*)

Response #160

As noted in the DEIR on pages 35 and 37, the proposed project is a permitted use in the M-1 zoning district. The project would create approximately 300 jobs (180 full- and 120 part-time jobs) and would employ approximately 197 people daily as discussed in Response to Comment #157. The project approval process in San Francisco provides opportunities for the public to voice their concerns to the decision-making bodies. In addition, the Planning Department and Redevelopment Agency have an ongoing outreach program to community residents and groups regarding the planning considerations for their respective neighborhoods (see Response to Comment #30), particularly in relation to the Bayview Hunters Point Redevelopment Area Plan and the Community Planning in the Eastern Neighborhoods (Rezoning Options Workbook).

Comment #161

"Big box stores do not belong alongside residential neighborhoods – not in your neighborhood and not in mine.

"The Home Depot store proposed for Bayshore Boulevard is inches from Bernal Heights. Cortland Avenue, Bernal's main street, would in effect be the entrance to Home Depot. I am aware that Bayshore was zoned for commercial/industrial purposes (a designation made well before the advent of big box stores). My objection is not to the appropriate commercial enterprises, but is rather a matter of scale.

"Bernal Heights is a thriving neighborhood, families with small children and many elderly people. Funneling deadly polluting traffic through our community would be cruel and senseless. Bernal Heights residents deserve better from the Planning Commission.

"Two questions:

"1. I assume the purpose of the Planning Commission is to improve the quality of life in San Francisco. Has there been a clamor throughout the city for a Home Depot closer than Colma?

"2. The purpose of the big box stores is to attract large crowds. I want to know how this will benefit the community that lives next door, i.e., Bernal Heights." (*Eleanor Vinsant, Resident*)

Response #161

The location of the proposed project was selected by the project sponsor after review of a number of potential sites. The project site is zoned for such a use, as discussed in the Initial Study on pages A-11 and A-12 of the EIR, and in the DEIR on pages 35 to 40.

The purpose of the DEIR is to identify potential impacts of the proposed project if it were implemented. When the Planning Commission considers the approval or disapproval of the proposed project, it will weigh the benefits of the project against the various concerns identified by those in opposition to the project.

Comment #162

"As a Bayview Resident and small business owner, Chair of the Economic Development Committee of the BVHP-PAC, member of the Bayview Merchants Association and Revere Avenue Residents Association, I have served on numerous local planning panels. The comments contained herein are of a personal nature and should not be interpreted as necessarily representative of any group or affiliation, although my knowledge of the facts of this project are the result of over two years of direct experience with the sponsor and my community. Like many of my neighbors, friends, and associates in the Bayview and Bernal communities and beyond, I share the desire for a revitalized Bayshore corridor, reviewed commerce and growth in the area, and a home improvement supply store. The use of the old Goodman's sites for building and construction related supply activity is consistent with the historic and extant nature of the corridor.

"In evaluating any proposal for land use or environmental appropriateness, we must rely on the accuracy of information and factual data in order to make sound decisions on behalf of our communities. After reviewing the Draft EIR for this project, it is clear that a number of inconsistencies form the basis of the criteria used for the conclusions drawn." (*Daniel Dodt, Bayview Resident, Chair of the BVHP-PAC Economic Development Committee, Member of the Bayview Merchants Association and Revere Avenue Residents Association*)

Response #162

The environmental analysis for the proposed project was based on the most accurate information available. The commenter has made specific comments regarding the accuracy of employment information. The estimated number of projected jobs is addressed in Response to Comment #36.

OPPOSITION TO THE PROPOSED PROJECT

Comment #163

The following comments contain remarks in opposition to the proposed project. They are compressed into one comment since they do not specifically address the accuracy or adequacy of the DEIR.

"There is another Home Depot 5 minutes away in Serramonte.

"We like small neighborhood business, which maintain the working-class nature of Bernal Heights."
(Naomi Adelson, Resident)

"I am writing to comment on the draft Environmental Impact Report for the proposed Home Depot project at 491 Bayshore Boulevard. I am a Bernal Heights resident, and I oppose the approval of this project, as it will have irreversible negative impacts on my neighborhood." (Akim Aginsky, Resident)

"I love my neighborhood. Today, I took a book and sat down on a sidewalk bench in front of a café. Inside, folks were brunching, while outside people were going about their quiet neighborhood day, picking up a few groceries on the corner, returning a movie rented the night before, patting the heads of the dogs awaiting their owners' return. I chatted with waiters on both sides of the street, and waved to friends driving by.

"I live in a wonderful neighborhood. It's unthinkable that such a quiet, quaint place could exist in one of the largest, most famous cities in America – San Francisco. The street on which the events of my day occurred is Cortland Avenue, the pulsing heart beneath the great Red Hill above.

"If the mega-retail chain Home Depot built and opened a store down the hill at the end of Cortland, this peaceful scene would change forever, would in fact disappear. Those who would shop at this Home Depot, coming from San Francisco neighborhoods lying to the north and west of Bernal Heights, would all converge at the intersection of Mission and Cortland streets, file their way onto Cortland, and impatiently push up and over the hill to Home Depot. In fact, this traffic would push right past two other independent hardware stores on their way to Home Depot, which would likely go out of business in Home Depot's wake.

"If this were to become reality, I would no longer have days like I had today – reading on the sidewalk bench, waving hello to my neighbors. Home Depot's presence would pollute the air I breathe, the scene I gaze upon, and the quietness we enjoy in Bernal Heights. I would feel alienated from these strangers pushing past me to consume retail goods.

"In closing, I want to quote Al Norman, from his book *Slam-Dunking Wal-Mart*, which lists the 'ten sins of retail sprawl.' In his book, he mainly addresses 'Hometowns, not Home Depot,' but I think this speaks directly to the future of this precious urban neighborhood.

- "• It destroys the economic and environmental value of land.
- "• It encourages an inefficient land use pattern that is very expensive to serve.
- "• It fosters redundant competition between local governments, an economic war of tax incentives.
- "• It forces costly infrastructure development at the edge of towns.
- "• It causes disinvestment from established core commercial areas.

- "• It requires the use of public tax support for revitalizing rundown core areas.
- "• It degrades the visual, aesthetic character of local communities.
- "• It lowers the value of surrounding commercial and residential property, reducing public revenues.
- "• It weakens the sense of place and community cohesiveness.
- "• It masquerades as a form of economic development.

"Please, no Home Depot. If I must patronize Home Depot, I will travel to Colma. But truth be told, I will continue to patronize the smaller Cole Hardware down the street." (*Kathy Allen, Resident*)

"Please vote no on the proposed Home Depot for Bayshore Avenue. This project will be a traffic and environment nightmare for this area. The Bayshore corridor already has building materials suppliers of every type and Home Depot is not needed." (*Scott Barlow, Resident*)

"The community could best be served by mixed income housing, community services, and outreach programs. We don't need or want another Home Depot." (*Sharon Carew, Resident*)

"I believe that the implementation of a Home Depot on Bayshore Boulevard will have severe negative repercussions on the neighborhood: Driving out of business smaller stores with related products (e.g., Cole Hardware, Floorcraft Tile), further degradation of the Bayview neighborhood." (*Melissa M. Diagana, Resident*)

"Traffic will be horrendous. Air quality will worsen. Quality of life will go down. There are already enough hardware stores/home improvement businesses nearby. Mixed-use housing/small businesses would be better use of that property." (*Larry Epstein, Resident*)

"The charm of this neighborhood depends on the variety of small, intimate shops where, we as residents, are known. A mixed-use shopping area with hardware, clothing stores, bed and bath, movie theaters, etc., is so much more suited to our atmosphere and traffic ability than huge, impersonal big box stores. I have lived here for over twenty years." (*Pam Ernst, Resident*)

"I oppose any Big Box retailers on Bayshore." (*Mary Fitzgerald, Resident*)

"We have a successful Home Depot in Daly City. Do we need two in such close proximity given the negative impact on our community? Answer must be no." (*Jean Fontana, Resident*)

"We wish to tell you that we strongly oppose the [Proposed Home Depot on Bayshore Boulevard] 'big box' type store." (*Ellen M. Frank and Joseph Majer, Residents*)

"I urge you to reject this proposed project. I am certain we can do better than Home Depot at this site." (*Nic Griffin, Resident*)

"I don't want my lovely family neighborhood to look like the hemmed in houses above Serramonte and Tanforan. If roads are somehow widened to accommodate extra traffic, I don't want to be a cut-off island of houses caught between freeways. Bernal was once a place the City paid people 'homestead' discounts to move to. Now it is desirable. Don't drag it down.

"I love San Francisco. I love its neighborhoods and small businesses and restaurants and individual character. There are already too many chain stores in San Francisco that are slowly eroding some of its character. Please, please do not open the door further to this characterless, oversized assault on

our city. We need City Planning that plans to protect and enhance the quality of life in our city." *(Phoebe Grigg and Jim Miglino, Residents)*

"The increase in traffic and the loss of local jobs would be disastrous for this area. We don't need another big box store in this area. Please deny permission for it." *(Martha S. Herman, Resident)*

"We oppose the approval of this project." *(Susan Hershey and Judge Auffinger, Residents)*

"To the extent that they belong anywhere, big box stores like Home Depot do not belong near residential neighborhoods, because they would cause substantial negative impacts to those neighborhoods, as discussed above. This type of project is only suited to a non-residential, suburban-type area served only by a highway, where the additional traffic and its substantial negative impacts would not be felt by people living nearby. The harm that Bernal Heights would suffer from this project would be irreversible, because the project would only increase the amount of traffic on Cortland Avenue, which, along with the closure of locally owned stores, will permanently change the nature of the neighborhood for the worse. This project is totally inappropriate for this area, is unwanted by the vast majority of people in Bernal Heights, and should be rejected." *(Jeff Hoffman, Resident, written comments)*

"I strongly and unequivocally am opposed to this project. I object to this hearing in general, because of the size of this room. You commissioners either knew, or should have known, that there were going to be a lot of people here, and to shove people into overflow rooms to me is not appropriate. Those rooms are for emergencies, when you had no way to know there are going to be a lot of people here. You should have gotten a bigger room, for people to sit here, and not be forced to go to another room and watch the hearing on television.

"The general objections to the project are that many, if not most of us who live in the city, don't want big-box stores like Home Depot or Wal-Mart, and I don't understand that the Commission is looking at making the entire Bayshore a big-box district. This would totally change the character of that part of the city, if not the city as a whole. Many, if not most of us want to shop at locally owned small businesses, not big out-of-town corporations.

"Secondly, I think it is inappropriate for a city like San Francisco to have a big-box project like this, because it does so much destruction to a residential neighborhood that it is near. To the extent that these things are appropriate at all, which is questionable – but to the extent that they are, they are appropriate for suburban areas, where access is mainly off of the highway, and people going to and from them don't disturb anyplace except maybe a traffic jam on the highway. But there are no residences around them, and if there is extra air pollution or traffic it is along the highway, and not on residential streets where people are walking, and where people are living, or a small shopping district like Cortland Avenue, where many of us, including myself, walk to go shopping." *(Jeff Hoffman, Resident, oral testimony)*

"Visitation Valley didn't want Home Depot and they fought them off. And Bernal Heights will too." *(Rachel Kesel, Resident)*

"I am writing to comment on the draft Environmental Impact Report for the proposed Home Depot project at 491 Bayshore Boulevard. I am a Bernal Heights resident, and I oppose the approval of this project, as it will have irreversible negative impacts on my neighborhood." *(Kathleen King, Resident)*

"We also have local businesses that should [have] an opportunity to devise project plans and financing for this very local property that is right in the center of our community." (*Lynnly Labovitz, Resident*)

"We are, already, well served by a variety of hardware stores, lumber yards, flooring, bathroom, and kitchen stores. Should someone need to shop at a Home Depot, there's one just 10 minutes away. There's no compelling need for such a store as Home Depot. In fact, given Home Depot's competitive practices, existing businesses' viability will be strained.

"Philosophically, Home Depot runs counter to fundamental notions of neighborhood. Its success will depend on drawing people from many other neighborhoods who will come, make their purchases, and leave without any further consideration for where they've been. This is a city neighborhood. Our visitors usually come for a variety of amenities (a cup of coffee, a browse at the bookstore, bunch of flowers, hair cut, etc.). If there is a place for stores like Home Depot, it is in suburban wastelands.

"Home Depot does not share our values and sense of community. It doesn't allow for organized labor, for instance." (*Jeremy and Janice Lane, Resident*)

"A Home Depot in Colma is only 10 minutes away by car from this proposed location. There can surely be little benefit to Home Depot other than cannibalization of sales.

"San Francisco should be promoting local businesses where the profits are kept within the community rather than a large chain with little regard for the environment of the neighborhoods they propose to disrupt." (*Michael D., Linda, Catriana, Hanh, and Michael L. Larson, Residents*)

"I think that to have a strip of large retail stores there will divide the city instead of uniting it. It will make it almost like a border, so that people in Bayview and Visitation Valley and the other neighborhoods over there who will want to cross town to go to school and work -- it will be that much harder for them to do, and instead what need is a mixed use; a mid-sized retail development. I agree with the people who say we need something there. We do need something there, and a hardware store would be great there. But we need it in a size and on levels that fit with our community. I urge you to reject this.

"Furthermore, I believe that a row of large retail stores will divide the City, effectively excluding Bayview and nearby neighborhoods, whereas a mixed-use smaller development would further unite us." (*Deborah Levy, Resident*)

"I have a business that's about two blocks away from where Goodman's Lumber used to be. I used to go there all the time for hardware. It stands to reason that if my business is two blocks away, and people are driving by, I'm going to get more business. It sounds very good to me. I also go to the hardware store every other day, unfortunately, and I don't want to drive out to Colma. I will go and wait and circle and look for parking at Cole Hardware, because -- three reasons: I don't have to sit in a long line of monster trucks waiting to get into a parking lot. It is hard to park over there; I'm not supporting small business. And when I go in there, oh, my God, somebody knows something about hardware. And small businesses still get my vote every time. I'm a small business owner, but like I say, I will only benefit from Home Depot coming in. Everybody in my business says, 'Hey, I want to go there, but hey, I don't want them there.' The two things coming up on Bayshore -- I've got to say it is a wreck. I walk down the street; I live down there. But you know what? I notice a lot of business going on at 15th and Mission, and there's a whole lot of vagrants outside. So I don't buy the idea of putting a big-box retail in there, you are going to have planters and people out sunning themselves. It

is going to be the same. You just are going to have more people with signs saying 'Spend less money on a screwdriver and give the rest to me.' I don't want it in there. I think there's two main sides that are here. One is the environment, and the other is money, and I think anybody who has any sense knows which one to choose." (*Mollie Maloney, Resident*)⁶⁶

"I don't know why we need a big box there. The biggest store they've got in the area – I don't think they need that. They want to put in two small stores, fine. They will go through the whole reports on that.

"This is your city. I want you to think of San Francisco of the future: having a whole line of big boxes down there with the kind of traffic that brings in: That surely does benefit the money; surely does benefit anybody owns property down there. And I'm sure it helps their businesses, and I do want that area to improve; I want there to be more jobs for people. But I don't want it to be at the cost of people not being able to walk in their neighborhood; to be able to find parking in their neighborhood; to be able to breathe in their neighborhood.

"I love this city. I have lived here 30 years. I'm going to spend my life here. I want this place – I want us to think of the future. I want us to think about yes, we need more money, but the whole state needs more money; the whole nation needs more money. I want the environment to be considered. I want people to be considered. And I want business to be responsible." (*Ingrid Mardeson, Resident*)

"Please do not sacrifice my neighborhood to this project." (*Eugenie Marek, Resident*)

"We don't need a big box store here. Everything Home Depot sells is already available from local merchants." (*Michael Marrelli, Resident*)

"We need to support smaller businesses (family run) and not the 'big box' which leads to other big boxes and eliminates all sense of charm, community, and small neighborhood tranquility. There is a Home Depot in Colma 5 miles away. This is crazy." (*Nina Mayer, Resident*)

"The resulting impact on the 'neighborhood feel' of our commercial district." (*Patricia F. McManus, Resident*)

"I do not want my neighborhood to become a throughway for Home Depot." (*Amy C. Miller and Virginia Bowen, Resident*)

"I would like to urge you to reject this deficient plan. I feel it is flawed. I have lived in San Francisco for 28 years; it is my home. I love it." (*Chris Ellen Montgomery, Resident*)

"I am a native; my father also grew up in San Francisco, and my mother is from Potrero Hill, and I hear a lot of people talking about – in this meeting like you have here – we all have the same feelings, but we want it in somebody else's back yard. But Bayview wants this over there. It is a common-sense deal. We're talking common sense. I mean look at Home Depot in Colma. They did a beautiful, magnificent job over there. They did so well they built one right up the street. And if you go and visit it on the weekend – I shop at Home Depot; I'm not going to drive to Home Depot. And I urge you – small business people that are down at the bottom of Cortland Avenue are supporting Home Depot. Mr. Caldwell – I was over there looking at railroad ties at his place. Home

⁶⁶ The commenter is generally in opposition to the project even though this comment sounds supportive.

Depot has the same railroad tie for \$13.47; he has them for \$12.00. How long do you think that's to last?" (*Bill Nieto, Resident*)⁶⁷

"It would negatively impact local businesses such as neighborhood hardware stores and nurseries." (*Patrick J. O'Brien, Resident*)

"One big box is not OK. The potential for other big boxes is horrible and detrimental to the quality of life in our neighborhood." (*Jo Ann Ogden, Resident*)

"We get all pain and no gain. Shoot this one down and make them come back with something reasonable. I'll fight this plan tooth and nail." (*Chris Pagels, Resident*)

"No more big box stores in San Francisco. We cannot afford to be homogenized like the suburbs." (*Barbara Paley, Resident*)

"Home Depot is only 10 minutes away in Serramonte, no reason to affect local business and their families and employees by bringing big stores inside the City." (*Albert Perez, Resident*)

"I don't want my neighborhood (so many people) to be negatively impacted for the benefit of one corporate citizen. It is unfair. The sanctity of the neighborhood is more important. I will fight this all the way." (*Reneé Rausin, Resident*)

"I very strongly oppose the approval of this project, which will have irreversible negative impacts on my neighborhood, my family, and our future plans for raising our children in San Francisco." (*Lisa Rosenberg, Resident*)

"I have lived in Bernal Heights for 16 years, two blocks from Bayshore Boulevard. I have seen the neighborhood grow, yet retain its 'small town' feel. People are friendly and helpful. We are familiar to store owners, salespeople, librarians, etc. This is why I live here.

"Because of this impending possibility, we have considered selling our home and moving to another neighborhood. But, upon investigation, we continually feel that we would rather live here than anywhere else in the city. In addition, other more 'desirable' neighborhoods are not a financial possibility for us.

"Many, many of our neighbors feel similarly to ourselves. We, therefore, hope that you will reject this project." (*Deborah Ruskay, Resident*)

"Look at the safety record of not only the workers, but also of the shoppers. And that is basically what I wanted to say. I'm against this project; I'm not against business. But I think the uniqueness of our city, which I love dearly – I have lived here for many, many years – and I don't want to see it changed in the respect that we have all the big boxes coming in, and we're just another cookie-cutter town. Because this city is unique; a beautiful place. We want to keep it that way; we want to have jobs for people to make a decent living and live here and have good benefits, and raise our as well, for the safe environment that we have, and enjoy the beauty of it." (*Rick Shelton, Resident*)

"[A]s a Bernal Heights resident, I am very concerned about this project. I am not opposed to Home Depot per se, but I am definitely opposed to the scale of this project. Big boxes are traffic magnets,

⁶⁷ Ibid.

and this one would have all San Francisco as its catchment area since the next nearest is in Colma. Are these the sort of traffic patterns we want to create, not just for Bernal Heights but for San Francisco in general? There is no question in my mind that this would severely degrade quality of life for all Bernal Heights residents. Please reject this proposal.

"Alternative proposal: Let Home Depot build five to six 'little boxes' throughout San Francisco. Maybe this would raise the costs and in turn raise prices for customers, but the bottom line isn't always the bottom line. Let us be the leaders and not followers of public trends." (*Aidan Smyth, Resident*)

"We don't want the start of a new big box environment like there is in Colma. That area of Bayshore should be developed for housing and other community-enrichment purposes.

"We don't need a Home Depot when there's one five miles away. We just don't need it." (*Dan Sobel, Resident*)

"I am very concerned about the possible building of a Home Depot site at Bayshore and Cortland. This is not a NIMBY reaction, but a reaction based on history and fact. In other words, I am not here to impede progress, but to throw some science and common sense into the mix." (*Linda Weiner, Resident, Director of Air Quality Advocacy for the American Lung Association*)

"I write as a resident of the area contiguous to the Bayshore corridor, to oppose the big-box Home Depot currently planned for the corner of Bayshore and Cortland.

"Yet Bernal would be most immediately impacted by the planned development of a Home Depot. The entrance to a new parking structure, twice as high as anything previously on the site, will be right at the Cortland/Bayshore intersection. (Compare the old Goodman's and Whole Earth Access stores, which distributed parking down the length of that entire block.). In addition to this mammoth parking structure, the planned Home Depot will have a retail floor space 150 percent of the combined totals of the old Goodman's and Whole Earth stores. This is completely out of scale. And it is located not in the center of the Bayshore industrial area, but right at the gateway to Bernal. It cannot help but severely and negatively impact Bernal Heights. I believe that the Draft EIR suggests what the reality will be: a permanent traffic jam at the Cortland/Bayshore entrance to Bernal; and traffic clogging-to-asphyxiation on the still nascent Cortland commercial strip, just as it is receiving recognition in national magazines like *Sunset*. (There is already a serious dearth of parking there.)

"Moreover, big-box stores kill. They not only kill neighborhood businesses, they kill the psychological environment and sense of community for everyone involved. One need only go to Colma - where's the village there? Where's the human scale? I see only huge traffic jams on the off-ramps leading to those big-box shopping centers.

"Fifteen to twenty years ago, many of us took a gamble on Bernal, moving to an area where crack dealers were still shooting each other on Cortland Avenue. By dint of hard work and community organizing, we have helped revitalize this neighborhood. I see the planned Home Depot as a huge step in the wrong direction, and I call on other Bernal residents and groups to oppose it." (*Chris Witteman, Resident*)

"I strongly urge you to listen to the neighbors, the people who will have to interact and deal with a less desirable situation. Again, I oppose the development." (*David Ziegler, Resident*)

Response #163

The above comments are general in nature and express opposition to the proposed project. The commenters may state their concerns directly to the Planning Commission when the proposed project is considered for approval, which is a separate process that would occur after certification of the EIR.

Some commenters requested analysis of alternatives not discussed in the EIR. As noted in Response to Comment #147, the lead agency determined the range of feasible and reasonable alternatives to be analyzed in the DEIR.

SUPPORT FOR THE PROPOSED PROJECT

Comment #164

The following comments contain statements that are generally in support of the proposed project, and do not contain any specific concerns about the accuracy or adequacy of the Draft EIR.

"Back in 1995 I approached Home Depot to try to get a shop over near Cesar Chavez. Apparently that wouldn't go through, because of the City and PG&E. With this project I have nothing to do with, but I think it is a good project. We're here to study the impact that it will have on the environment and neighborhoods. Of course with any type of change there is resistance. There is positive aspects; there's negative aspects, but we're here to look at which has the most weight. The positive aspects have the most weight, because it will benefit many individuals: the individuals from the neighborhoods; the individuals that work for the City and County and other related small businesses – the small businesses as well – in the neighborhoods will benefit greatly. They probably think they will be out of business, but most likely their business will increase, due to the increased flow of individuals onto that area. I would like to speak right now as an owner-builder I have been to Home Depots from Fairfield to San Carlos, to buy products from Home Depots. The traffic problem which occurs in Colma is because there is a need for another Home Depot or another store. Actually, you should probably consider having two Home Depots in San Francisco, one on the east side and one on the west side. It wouldn't hurt, because right now the majority from the west side will still go to the Colma store because of the 19th Avenue traffic flow. One thing I would like to point out is that the neighbors from the area do have good concerns. I'll address the City and County and also the State, because of the on-ramps and off-ramps of the approaches, to take consideration for the No. 1 thing, which is safety: safety for the elderly; the handicapped; the children – it would benefit everyone greatly. And roads will improve; the neighborhoods will improve. Currently myself: I don't think you will catch me walking on Bayshore during any time in the evening or at night." (*Jorge Bustos, Resident*)

"I have been in the Bernal Heights district for many, many years; a little over 50 years. My house is 89 years old, and all these units the repair material came from the old Goodman store. I am hoping

and praying that the new store of Home Depot will be there. It is needed; it is a convenient location. As far as the traffic goes, that's a problem everywhere. It is not only convenient, because some of us who are older people certainly cannot get out of town to do our shopping. And it is convenient because a big store like Home Depot will have about everything you need. You don't have to waste time going anywhere else to find what you need. I trust that you will all remember that the income alone would amount to some \$400,000 annually in sales tax, and that there will be many – maybe 300 more jobs added. Please, let's not have any more delay on this matter." (*Aida Calico, Resident*)

"I am pleased to know that the draft EIR report includes improvements for the Bayshore Avenue, and I have learned something again today: that there is only Cortland Street entered into Bayview that's going to access Home Depot. I thought there were many other streets. And so, because there are many others, and then others will be improved also, that connects and provide an artery for traffic – not only Cortland is the only one, but there's Cesar Chavez, and then there are others that come from the eastern quarter to the west of Bayshore. I think it is – this is a great time for the city to have a business of such as Home Depot and I'm looking forward to purchasing. And I believe that the traffic and the quality of air, and also the archeological culture and all of things will be no more of an increase and providing some sort of health hazard as we have presently. Because I know that our energy companies that provide gas are working on methods and ways to reduce those contaminants, and so therefore when the trucks come and the cars come in the area, the air is going to be not as hard on us as we think it will be. So I support Home Depot, and look forward to any other businesses of sort that we can have come to the city. Thank you for your patience, and I'm looking forward to working with you." (*Charles Clary, Resident*)

"I have worked in that area about 20 years, and I have done business with about 90 percent of the businesses on Bayshore. It is very important that Home Depot be allowed to come in here, because the environmental impact of the death of Goodman's has caused an influx of heroin addicts, crack monsters, and speed freaks, who have congregated around this vacant property and has made it very, very – brought down the quality of life in the neighborhood. It will bring tax dollars and bring jobs and bring training." (*John DeGarmo*)

"Just wanted you to know that there is considerable support in Bernal Heights in favor of the Home Depot project, despite self-appointed spokespeople for the neighborhood who would have you believe otherwise. They organize neighborhood meetings within a framework of opposition rather than open discussion, and those in favor of the project begin to feel they are alone in their opinion, but not so." (*Cindy Ehrlich, Resident*)

"The environmental issues have been fully addressed in the EIR. Every day that this project is in limbo Bayshore Boulevard deteriorates with more litter and drug use, conducted around the old Goodman's site. As a small business owner, I'm tired of the delays, and I urge the Commission to recognize this document is thorough and complete. My family has owned property on Bayshore Boulevard since 1939, and has continually operated a business there. As has been stated before that whole area was lumber yards; there were lumber yards all over the place; hardware companies set up the next thing. Essentially with Goodman's and other companies, other than Carpet Connection, Floorcraft – it has always been a home improvement center. Since Goodman's has closed, the area has deteriorated. Most of the businesses in the area have lost business. People will come in and jobs will be created, and the tax revenue generated would be great for the City of San Francisco, and so basically I'm all for it." (*David Gregmore, Business Owner*)

"We write to you as representatives of the 'San Bruno Avenue Merchants Association,' to express our support for the Home Depot project proposed for [the] Bayshore Boulevard/Waterloo Street site in San Francisco, California.

"As executive officers of the Merchants Association we are in a unique position to offer insights into the potential impact of the proposed Home Depot project to our community's robust commercial strip.

"For your reference the San Bruno Avenue commercial corridor is in the Portola-Silver Terrace neighborhood, directly south and adjacent to the proposed Home Depot project site. San Bruno Avenue, which has two southbound (US-101) freeway off-ramps that access customer traffic flow directly through our neighborhood towards the Bayshore Boulevard Home Depot site, faces a potential of increased traffic impact problems to an already heavily congested commercial strip. However, we at the Merchants Association believe that the proposed Home Depot project's design considerations regarding traffic and parking issues will adequately accommodate any potential traffic increase, thereby, minimizing any adverse impact to our community.

"Additionally based upon our own research, it is the view of our Merchants Association that the Home Depot project will in no way negatively impact the competitive viability of our existing businesses operating on our San Bruno Avenue commercial corridor, but rather the proposed store can serve as a significant local anchor store, potentially drawing in a broader customer base in a spill over effect, further advancing our vision of developing San Bruno Avenue into a regional shopping destination. We, accordingly, strongly recommend that you allow the Home Depot project proposed for [the] Bayshore Boulevard/Waterloo Street site in San Francisco, California, to move forward." *(Phillip Guan, President, San Bruno Avenue Merchants Association)*

"Commissioner Feldstein noted at one point, all this planning has something to do with social engineering. And I'll be just very brief on this: San Francisco needs jobs; San Francisco needs tax revenue – especially in our times of deficit. And I'll just close on a personal note: I'm unemployed at the moment, and it sure would be nice if I could get a job down there." *(Robert Heacock, Resident)*

"We write to you as representatives of the 'Community Alliance of the Portola and Silver Terrace,' and active neighborhood improvement association in the Portola-Silver Terrace neighborhood, to express our support for the Home Depot project proposed for [the] Bayshore Boulevard/Waterloo Street site in San Francisco, California.

"As executive officers of the C.A.P.S. (the 'Community Alliance of the Portola and Silver Terrace') organization - chartered to promote the betterment of, and community outreach to, the Portola-Silver Terrace neighborhood of San Francisco, California – we are in a unique position to offer insights into the history and background circumstances of our community and its residents, significantly relevant to the future prospects of the Home Depot project proposed for [the] Bayshore Boulevard/Waterloo Street site in San Francisco, California.

"For your reference the Portola-Silver Terrace neighborhood, which straddles Supervisorial district boundaries between Districts 9 and 10, is directly south and adjacent to the proposed Home Depot project site. Portola-Silver Terrace, which has two southbound (US-101) freeway off-ramps and a third northbound off-ramp feeding customer traffic flow directly through our neighborhood to the Bayshore Boulevard Home Depot site, faces a potential of increased traffic impact problems to our community's already heavily congested San Bruno Avenue commercial strip, akin to the concerns raised by the neighboring Bernal Heights community in regard to their Cortland Avenue commercial corridor. We at C.A.P.S., however, do not share agreement with their aversion to the Home Depot

project, and based upon our own research, we believe that, generally speaking, Portola-Silver Terrace residents, and merchants alike, are favorable of the proposed Home Depot project.

"It is our view that the proposed Home Depot project's design considerations in regard to traffic and parking issues will be sufficient to accommodate any potential traffic increase, thereby, minimizing any adverse impact to our community. Additionally, in our view the Home Depot project will in no way negatively impact the competitive viability of any existing businesses operating on our San Bruno Avenue commercial corridor, but rather the proposed store will provide sorely needed services and products lacking in our community. Additionally, we note that the Silver Terrace portion of our community lies within the boundaries of the Bayview Project Area Committee's purview and, as such, our project concerns are further mitigated by the fact that our Silver Terrace residents are also eligible to be beneficiaries of Home Depots' stated preferential store position hiring policy; with our high rate of unemployment, access to job opportunities is a dire concern to our community.

"We, in fact, look forward to establishing a fruitful and committed community partnership between our San Bruno Avenue Merchants and Home Depot. We, accordingly, strongly recommend that you allow the Home Depot project proposed for [the] Bayshore Boulevard/Waterloo Street site in San Francisco, California, to move forward." (*Dwayne Jusino, President, Community Alliance of Portola & Silver Terrace*)

"On behalf of the San Bruno Avenue Merchants Association we are for Home Depot at the Bayshore Boulevard, and I actually have a letter here from our president in support of that, with our reasons." (*Terezina Jusino, Resident*)

"The EIR is a very complicated document, and there's a lot of people full-time jobs trying to go over these things, and trying to make sure what is in here is best for the community, and does not decrease the quality of life not only for Bayview Hunters Point but also for our neighbors in Bernal. We did spot some inaccuracies, and I would like to commend Home Depot for responding to those inaccuracies, such as the amount of the population daily workers – I forget what actually the term is for it, but it was 75 to 100 in the DEIR, and we questioned about this, and now they gave us a formula for how it is not supposed to be. My point is this: It takes a common goal for that stuff. I've got a full-time job and full-time family, and most of the people who work with me on that stuff will have the same type of thing. And I always believe in measure twice and cut once, so when I make the final seal of approval of this, I want to make sure it sounds good for Bayview, but also for the surrounding neighbors." (*Angelo King, Resident*)

"I am here to support it very, very strongly. I think it would be – well, first of all, that area has become kind of a deteriorating war zone, and if you don't believe me, drive around there. I mean for blocks and blocks and blocks. I think we're very fortunate to have Home Depot want to put something there. I'm not a professional; I don't represent anybody; I'm not going to make any money by being here. I do belong to the Northwest Bernal Heights Association, which is a neighborhood association that is run and governed by the people who actually live there, not by anybody else who is paid. Anyway, the thing I hear a lot about is how Cortland is going to be inundated with cars. I think if one person tries to do that once, who doesn't live in Bernal Heights, and lives somewhere else other than Bernal Heights, they will only do it once. Kind of a ridiculous way to try to get to any place anywhere except Bernal Heights, going from Bayshore to Cortland to Mission. Once you get to Mission, where are you going to go? You can't get anywhere very easily. So I can't imagine a lot of traffic because of this. There's a lot of buzz words being used: 'box businesses'; 'traffic this'; 'traffic that' – and my suspicion is people who come up with the facts are really coming up with the facts as they were made to come up with facts. I think it is something that would be very beneficial

to the city: the tax; the employment. And the truth is, I'm a liberal Democrat. We have demonized business progress so much in the city that it is absurd. I mean it is just a lot of nonsense. Just a lot of – always politicking that happens, and good things just don't get done. I think we're very lucky that Home Depot wants to come here. I think it will improve that area. And I look forward to seeing it happen; I look forward to having the Home Depot there." (*Michael Miller, Resident*)

"I have lived in Bernal Heights for 28 years, and I support the Home Depot project on Bayshore Boulevard. I have been involved in this project for almost two years now, and I can tell you that the Home Depot representatives have done an excellent job in their outreach to our community, for those of us who were willing to listen. The Home Depot team has given two presentations to the Northwest Bernal Alliance, a community driven non-profit all-volunteer neighborhood improvement group, of which I am a member. Several of our members asked for an additional exit and entrance; glare reduction from the roof at night; and mitigation of the project's traffic impact. On a second visit to our community group, the Home Depot traffic architect and consultant showed us the design changes they made in order to address these concerns. Our neighbors to the east, the Bayview Hunters Point communities, and the BVHP-PAC, have worked long and hard to create a concept plan to revitalize this dying corridor, which includes a project such as this. I support this plan. I am satisfied with the DEIR, and ask that you move this project forward." (*Laurel Muniz, Resident*)

"You shop actually – when that site was Allstate Plywood in the 70's and the early 80's, and never once – we were in remodeling at the time – I think I used Cortland Avenue twice, even when we were doing remodeling work in the Mission – passes right down there. Secondly, in terms of its traffic impact, many of our members – and I know quite a few people in construction – we use and go to use Home Depot. One of our members, in fact, his bid last year was \$250,000. But at the same time, he remembers also using small hardware companies, Matchmarty Pacific, Whitmore Supply – which has construction equipment.

"So again, we support this. I think that, you know, quality of neighborhoods and quality of life is very important, but the fact is that Bayshore has been historically an industrial area where, again, you had servicing down there. In fact, one of the Ford Motor Company recently moved their facilities right down there. I bring my car down there for repairs and maintenance and things like that. So that scenario, where business was actually intended to actually, you know, be created and prosper." (*Joe O'Donoghue*)

"I have lived in San Francisco for 14 years, and I'm here to express my vehement support for accepting the draft EIR, and moving ahead with this project." (*Rick Rutledge, Resident*)

"Since the Goodman's closed, we lost a lot of business. And its business went down and anything we have to buy for the like tiles, lights, we have to Colma. And we would like to have Home Depot." (*Ali Saeed*)

"I am speaking today as the lawyer on behalf of Home Depot. Very briefly, Home Depot will be submitting some more detailed comments on the EIR as of the close of the public comment period tomorrow. Our opinion is that the EIR does, very thoroughly and comprehensively, evaluate the impacts of the proposed project. In fact, in our view it overstates the impacts by using very conservative, worst-case assumptions. But in the CEQA world that's a good thing, understanding that the impacts and mitigation measures are not too small. The public has an opportunity to be aware of what the impacts might be. Our mitigation obligations will be sufficient to cover what our impact may be, and more. And again, we will submit more detailed comments, but I would very

heartily commend the City on a very thorough, comprehensive document." (*Anna Shimko, Attorney at Law for Home Depot*)

"I live right in between where Colma Home Depot is and where the proposed Home Depot site is. I practically go to the Home Depot at least twice a week; sometimes twice a day. I do spend a small fortune there. And I am sure that the EIR problem, the Colma they welcome me, because when I go there I have to drive around and around to find a parking space. I don't think that the EIR will probably be that bad for Bayshore Boulevard, because I am sure when Home Depot construct a parking lot they will probably make the entrance not from the Bayshore; they will make people turn into a side street for the garage. I'm sure they are smart in that kind of design. I spend so much money at Home Depot – even though it cheaper for me to go shop in Colma Home Depot because of sales tax is less, as a good San Franciscan I like to see the Home Depot Bayshore site get approved." (*James Tam, Resident*)

"I simply don't intend to stand and speak in behalf of any community, but I will speak on behalf of myself, and on behalf of those that I know who have looked at this DEIR and find it adequate, and that it is time to move on. Certainly, by the way, Dr. Reese Walker had to leave early, so I'm kind of standing in his stead. He's lived there in that community and operated a church there. And when you say the people of Bayview have looked at it and found it to be overall adequate by the majority of people who have been involved in the process, that's really saying something, because as someone who is right now breaking ground on a project in Bayview Hunters Point, they are, without question, when it comes to pollution and toxics and those kind of issues, the most sophisticated community in San Francisco, because of what has happened to them, with all the problems in that community. They do not take these issues lightly. And so it is high time that we move on with this project, because you see, there is a certain kind of environmental and pollution danger in Bayview Hunters Point, and that's the pollution and environmental dangers of unemployment, dashed hopes and unrealized dreams that unemployment will cause you. We need some employment, and that in itself should be within your reports an environmental issue, because it certainly does damage to the environment when people are on the street; when people cannot support their families. And it is very easy to call these dead-end jobs when you have a job. But when you don't have one this job beats no job, and certainly they are better than the jobs you would find in shopping districts in Bernal Heights, because I go up there, and you can drive along Cortland and go in and out of those shops, and you won't find five black employees on the whole street. So it is high time that we move this project forward and quit playing around with the EIR and get San Franciscans busy working again." (*Rev. Arnold Townsend, Resident*)

"A great many of our members (60), residents and businesses find opposition to the Home Depot 'a no brainer.' We favor the Home Depot locating on/at the old Goodman site for the following reasons: (1) There is no traffic or environment impact, (2) Goodman established the site as building and home improvement supply and service for over 50 years, (3) Home Depot would entice better service supporting businesses, (4) Home Depot would hire and train many employees for Bayview and neighborhood residents (decreasing crime), (5) Tax income to the City of San Francisco, not Colma, Daly City, San Mateo County, and (6) Overall economic vitality to the surrounding area." (*Royce H. Vaughn, Chairman and CEO Omi Business League*)

"I am here to give my enthusiastic endorsement for the EIR. As avid do-it-yourselfers, my husband and I used to frequent Goodman's, and we are very sorry to see it close. For the last few years we have traveled to the Home Depot in Colma once; sometimes two or three times a week. We hate the fact that our sales tax from our purchases go to another community, a community full of dead people,

yet. Having to travel so far for our home improvement needs has been ridiculous, but what has been even worse is watching that area of Bayshore sit fallow. My only question is, why is it taking so long to replace one home store with another bigger and better home store? San Francisco desperately needs the jobs, revenue and utility that a Home Depot will bring. The Home Depot will be located in an ideal industrial location, close to the freeway on-ramps and off-ramps. The proposal asks for plenty of parking, and it provides a low-cost alternative that is accessible by public transportation, so what is the problem? The problem is that this is San Francisco, so even the most logical and beneficial proposals must be demonized. Some say Home Depot will create endless traffic snarls, and ruin neighborhood character, and one street in particular will be overrun with traffic. I remember hearing such things about another project that faced intense opposition, Pac Bell Park, but today you are hard-pressed to find someone with anything bad to say about it. The projections about traffic hell just never materialized, and instead, we have a beautiful, world-class facility, that catalyzed change in a once-sterile area of the city. A Home Depot, a small project by comparison, will also be a catalyst for positive change for Bayview Hunters Point, so please give this excellent project your support. Do so, and we'll help to create new jobs and vitality, while generating public revenue for desperately needed programs. We cannot let fantastical, self-serving predictions, or disdain for all things corporate determine the course of this city." (*Leora Vestel, Resident*)

"I support bringing Home Depot to the old Goodman's lumber site. I live at 3587-A Mission Street. I think that is would be good to make jobs for the people in San Francisco, and that we and the other people that live here don't need to go to Daly City to get to the Home Depot for our big hardware needs and appliances, and it would be good for all of us in the long run." (*Patricia Wayman, Resident*)

Response #164

The above comments are general in nature and express support for the proposed project. The commenters may state their opinions directly to the Planning Commission when the proposed project is considered for approval, which is a separate process that would occur after certification of the EIR.

E. STAFF-INITIATED TEXT CHANGES AND ERRATA

The following changes to the text of the DEIR are made in response to comments on the DEIR or are included to clarify the DEIR text. In each change, new language is **bold**, while deleted text is shown in ~~strike through~~, except where text is indicated as entirely new, in which case no bold is used for easier reading.

The DEIR incorrectly referred to "Loomis Avenue." All references within the document have been changed to Loomis Street.

On page 1, the reference to "Loomis Avenue" and the number of parking spaces are changed in the first paragraph:

This is the ~~Draft~~ Environmental Impact Report (EIR) prepared in accordance with the California Environmental Quality Act (CEQA) for the proposed demolition of two vacant buildings at 491 Bayshore Boulevard/196 Loomis ~~Avenue~~ **Street** between Bayshore Boulevard and Loomis Street at Waterloo Street, and the construction of an approximately 153,089-square-foot (sq.-ft.) home improvement center and a separate parking garage for about ~~550~~ **539** parking spaces.

On page 2, the square footage of the parking garage is added and the number of parking spaces is changed in the first paragraph, fourth line:

~~An separate, attached,~~ **approximately 235,597 sq.-ft.** parking garage consisting of two levels with rooftop parking totaling ~~550~~ **539** parking spaces would also be constructed ~~as a separate structure.~~

On page 6, the number of parking spaces is changed in the third paragraph, fourth line:

Since the proposed project would include ~~550~~ **539** parking spaces, it would meet the *Planning Code* requirements and meet the anticipated parking demand.

On page 11, the number of parking spaces is changed in the first paragraph, second line:

The proposed project would replace two existing buildings, totaling 107,372 sq.ft., with an approximately 153,089 sq.-ft. home improvement store and a ~~550~~ **539**-space parking garage.

On page 11, the number of employees anticipated for the proposed project is corrected in the second paragraph, third line:

This daily population would consist of approximately ~~75 to 100~~ **175 to 197** employees and as many as 2,500 to 3,000 shoppers per day.

On page 12, the end of the first partial paragraph is revised to indicate that the project sponsor would pay for the mitigation:

With this mitigation ~~improvement~~ **measure**, the intersection would operate at LOS C during the weekday PM peak hour and LOS D during the Saturday midday peak hour. **The project sponsor would pay for the costs of this measure.**

On pages 15 and 16, the Cultural Resources Mitigation Measure is replaced by the mitigation measure listed on pages C&R.365 to C&R.368.

On page 16, because the first improvement measure was determined to be infeasible by DPT, it is deleted and the second sentence of the paragraph before the transportation improvement measure is revised:

~~These~~ **The following** measure would be implemented by the Department of Parking and Traffic and the cost ~~of the first measure~~ would be borne by the project sponsor.

On page 16, the first transportation improvement measure is deleted because it was determined to be infeasible by DPT:

- ~~• To improve operations and safety at the eastbound approach of Cortland Avenue to Bayshore Boulevard, the centerline between the eastbound and westbound directions could be restriped to provide 24 feet in the eastbound direction and 16 feet in the westbound direction. These changes would be designed to reduce project-generated nonsignificant impacts. In addition, the bus stop could be shortened to 60 feet long (starting at Hilton Street) and two lanes could be striped at the approach. As a result of these changes, vehicular circulation would substantially improve and the operation conditions of the approach and the entire Bayshore/Cortland intersection would improve.~~

On page 16, Transportation bullet, eighth line, is revised to clarify that the project sponsor is not required to pay for the improvement measure, although they have agreed to do so:

These improvements would be appropriate independent of the project **under existing conditions and would be designed to mitigate cumulative significant impacts to which the project would not make a significant contribution.**

On page 20, the number of employees and customers anticipated for Alternative D is corrected in the second full paragraph, sixth line:

The estimated on-site population would be about ~~50 to 75~~ **122 to 138** employees and between ~~2,400~~ **2,300 to 2,700** shoppers per day, and would increase the concentration of people on the project site.

On page 22, the number of employees and customers anticipated for Alternative E is corrected in the second line from the top of page:

The estimated daily on-site population would be about ~~70 to 95~~ **149 to 180** employees and between ~~2,300~~ **2,400 to 2,600** shoppers per day, and would increase the concentration of people on the project site.

On page 25, the number of parking spaces is revised and the reference to "Loomis Avenue" is corrected in the first paragraph:

The project sponsor, Home Depot, proposes to construct an approximately 153,089 sq.-ft. home improvement store and a separate ~~550~~ **539**-space parking garage on a 5.73-acre site at 491 Bayshore Boulevard and 196 Loomis Avenue Street.

On page 26, to clarify discussion of the parking garage, under Project Characteristics, the following is added at the end of the first paragraph:

An approximately 235,597 sq.-ft. parking garage would be constructed as a separate structure that would contain the 38,405 sq.-ft. second floor sales area (which is included in the 153,089 sq.-ft. total for the home improvement center and is not included in the parking square footage), accessible by elevator and escalator to the ground floor sales area. The total square footage of the project would be approximately 388,686 sq.ft., including all parking areas.

On page 26, the number of parking spaces is changed under Project Characteristics, in the second paragraph, second sentence:

A separate ~~550~~ **539**-space, two-story parking garage plus rooftop parking would also be constructed with cast-in-place concrete.

On page 27, Figure C&R.8 replaces DEIR Figure 1.

On page 28, Figure C&R.6 replaces DEIR Figure 2.

On page 33, the construction and completion schedule is changed in the third paragraph, first line:

Construction is expected to begin in ~~2003~~ **2005**, with the store opening in ~~2005~~ **late 2006**.

On page 36, Figure C&R.9 replaces DEIR Figure 7.

On page 37, the following sentence is added at the beginning of the third paragraph to include reference to the school in the summary:

A child care center, the Big City Montessori School, is located about 300 feet south of the proposed project at the northeast corner of Loomis Street and Industrial Street.

On page 37, the third paragraph, line five, the sentence is revised to indicate that the building is in fact occupied:

A ~~vacant~~ building supply warehouse is located to the south, across Waterloo Street.

On page 41, the following subsection is added prior to the Zoning section in order to include the Area Plan element:

South Bayshore Area Plan Element

- Policy 3.1, to 'improve and establish truck routes between industrial areas and freeway interchanges.'
- Policy 4.1, to 'develop a comprehensive network and schedule of roadway improvements to assure that South Bayshore maintains an adequate level of service at key intersections as the residential and work force population in the district increases.'
- Policy 7.3, to 'develop secondary nodes of commercial activity.'
- Objective 8, to 'strengthen the role of South Bayshore industrial areas in the overall economy of the district, the city, and the overall region.'
- Policy 8.1, to 'maintain industrial zones in Northern Industrial and India Basin subdistricts.'
- Objective 9, to 'improve linkage between growth in South Bayshore industrial areas and employment and business needs of the Bayview Hunters Point community.'

On page 41, the following subsection is added prior to the Zoning section, after the addition immediately above, in order to include existing area design guidelines as the proposed Industrial Area Design Guidelines for the *South Bayshore Area Plan* have not yet been adopted:

Industrial Area Design Guidelines

New industrial buildings must:

- respect the prevailing industrial scale, pattern and architectural character of predominantly industrial blocks;
- utilize innovative materials and design that enrich the architectural character of predominantly industrial areas;
- provide loading and parking facilities in the rear which can be accessed through an alley or secondary street;
- provide mid-block alleys, courtyards and other design elements that help break down the scale of large industrial blocks; and
- be built to lot line at the street frontage, unless a pattern of a building set-back exists, in which case the prevailing set-back pattern should be reflected.

On page 43, the description of Alemany Boulevard, which was omitted from the DEIR, is added at the bottom of the page:

Alemany Boulevard is an east-west major arterial that generally parallels I-280 throughout the southern portion of San Francisco. Alemany Boulevard operates between Bayshore Boulevard and Junipero Serra Boulevard, at which point it merges with Highway 1. In the vicinity of the project site, Alemany Boulevard has three lanes in each direction with no

parking permitted on either side of the street. In the San Francisco *General Plan*, Alemany Boulevard is classified as a Major Arterial in the CMP Network and a MTS Street.

On page 46, Figure C&R.10 replaces DEIR Figure 10.

On page 52, Figure C&R.11 replaces DEIR Figure 11.

On page 53, the route of the 44-O'Shaughnessy Muni line is corrected in the first bullet point at the top of the page:

The 44-O'Shaughnessy is a cross-town route which provides travel between the Inner Richmond, Golden Gate Park, Twin Peaks, Glen Park, ~~Bernal Heights~~, **Portola**, **Silver Terrace** and Bayview Hunters Point neighborhoods.

On page 68, to clarify that some drivers may eventually divert onto Crescent Avenue to avoid potential queues and delays that may develop on Cortland Avenue, the first partial paragraph, lines six and seven are revised:

To avoid the queues and associated delays at the Bayshore/Cortland intersection, drivers may divert to other routes, such as Putnam Street to **Crescent Avenue**.

On page 70, the number of parking spaces is revised in the second paragraph, fourth line:

Since the proposed project would include ~~550~~ **539** parking spaces, it would meet the *Planning Code* requirements and meet the anticipated parking demand.

On page 81, the first sentence of the last paragraph is revised to read:

The ambient air quality standards are intended to protect public health and welfare, ~~and they incorporate an adequate margin of safety.~~

On page 85, Table 8 is updated with Table C&R.19, page 259, which includes information on data from 2002 and includes levels of PM_{2.5} with respect to the air quality standards in effect at the time.

On page 96, the present standard for lead hazard is corrected in the second full paragraph, second sentence:

The DPH Environmental Health-Hazardous Waste Unit (EHS-HWU) considers soils with a total lead concentration of over ~~1,000~~ **750** parts per million (ppm) to be potentially hazardous.

On page 99, the present standard for lead hazard is corrected in the second line from the top of the page:

The *California Code of Regulations, Title 22*, considers soil with lead to be hazardous waste if it exceeds a total concentration of ~~1,000~~ **750** parts per million (ppm) and a soluble

concentration of 5 ppm. The Phase II investigation revealed elevated levels of lead, however, only ~~one~~ **three** of the 45 samples exceeded the threshold concentration.

On page 103, the number of parking spaces is revised in the first paragraph, fifth line:

The proposed project would replace two existing buildings, formerly used for a home improvement and building supply store and a retail home furnishing and supply store totaling approximately 107,400 sq.ft., with an approximately 153,089 sq.ft. home improvement store and a ~~550~~ **539**-space parking garage.

On page 103, the number of employees anticipated for the proposed project is corrected in the second paragraph, third line:

This daily population would consist of approximately ~~75 to 100~~ **175 to 197** employees and as many as 2,500 to 3,000 shoppers per day.

On page 106, the end of the first paragraph is revised to indicate that the project sponsor would pay for the mitigation:

With this mitigation ~~improvement~~ **measure**, the intersection would operate at LOS C during the weekday PM peak hour and LOS D during the Saturday midday peak hour. **The project sponsor would pay for the costs of this measure.**

On pages 109 and 110, the Cultural Resources Mitigation Measure is replaced with the measure listed on pages C&R.365 to C&R.368.

On page 110, the second sentence of the paragraph before the transportation improvement measure is revised because the first improvement measure was determined to be infeasible by DPT:

~~These~~ **The following** measure would be implemented by the Department of Parking and Traffic and the cost ~~of the first measure~~ would be borne by the project sponsor.

On page 110, the first transportation improvement measure is deleted because it was determined to be infeasible by DPT:

- ~~• To improve operations and safety at the eastbound approach of Cortland Avenue to Bayshore Boulevard, the centerline between the eastbound and westbound directions could be restriped to provide 24 feet in the eastbound direction and 16 feet in the westbound direction. These changes would be designed to reduce project-generated nonsignificant impacts. In addition, the bus stop could be shortened to 60 feet long (starting at Hilton Street) and two lanes could be striped at the approach. As a result of these changes, vehicular circulation would substantially improve and the operation conditions of the approach and the entire Bayshore/Cortland intersection would improve.~~

On page 111, the first full sentence, is revised to clarify that the project sponsor is not required to pay for the improvement measure, although they have agreed to do so:

These improvements would be appropriate independent of the project **under existing conditions** and would be designed to mitigate cumulative significant impacts to which the project would not make a significant contribution.

On page 116, the number of parking spaces is revised in the second paragraph, third line:

The effects of the proposed 153,089 sq.ft. project and the ~~550~~ **539**-space parking garage would not occur, nor would there be air quality impacts from the proposed project which exceed the BAAQMD threshold of significance for regional emissions of reactive organic gases (ROG).

On page 117, the first paragraph, seventh line, is revised to clarify what parking would be anticipated for other potential development on the project site should the No-Project Alternative be selected:

It is assumed that the buildings would comply with building codes **and the *San Francisco Planning Code* requirement for the provision of off-street parking (which would equate to 347 spaces).**

On page 117, the second paragraph, fourth line, is revised to include the total daily vehicle trips generated by the alternative and percentage comparison with the proposed project:

~~This Alternative B would generate about approximately 6,136 weekday daily vehicle-trips and 552 PM peak hour vehicle-trips; in the weekday PM peak hour and approximately 8,222 Saturday daily vehicle-trips and 789 midday peak hour vehicle-trips in the Saturday midday peak hour, compared to proposed project's 848 weekday PM peak hour trips and 1,268 trips in the Saturday midday peak hour (about a 35 percent reduction from the proposed project).~~

On page 122, the second paragraph, second line is revised to clarify the peak hour and correct the percentage comparison with the proposed project:

~~The Alternative C would generate approximately 4,059 weekday daily vehicle-trips and 332 PM peak hour vehicle-trips, and about approximately 4,202 Saturday daily vehicle-trips and 497 midday peak-hour vehicle-trips, compared to proposed project's 848 weekday PM peak hour vehicle trips and 1,268 vehicle trips in the Saturday midday peak hour (an approximately forty 60 percent reduction in the vehicle trips generated by from the proposed project).~~

On page 123, the number of employees and customers anticipated for Alternative D is corrected in the third paragraph, sixth line:

The estimated on-site population would be about ~~50 to 75~~ **122 to 138** employees and between ~~2,400 2,300 to 2,700~~ **2,600** shoppers per day, and would increase the concentration of people on the project site.

On page 124, the first paragraph, third line, is revised to clarify the peak hour and the percentage comparison with the project alternative:

Alternative D would generate approximately 7,266 weekday daily vehicle-trips and 595 PM peak hour vehicle-trips, and ~~approximately about~~ **7,521** Saturday daily vehicle-trips and 890 **midday** peak hour vehicle-trips, ~~compared to the proposed project's 848 weekday PM peak hour vehicle-trips and 1,268 vehicle-trips in the Saturday midday peak hour (about a 30 percent reduction from the proposed project).~~

On page 126, the number of employees and customers anticipated for Alternative E is corrected in the first paragraph, seventh line:

The estimated daily on-site population would be about ~~70 to 95~~ **149 to 180** employees and between ~~2,300 2,400 to 2,600~~ **2,700** shoppers per day, and would increase the concentration of people on the project site.

On page 126, the second paragraph, line one, is revised to clarify the peak hour and the percentage comparison with the proposed project:

Alternative E would generate approximately **9,480** weekday daily vehicle-trips and 776 PM weekday peak hour vehicle-trips, and ~~approximately~~ **9,796** Saturday daily peak-hour vehicle-trips and ~~about~~ **1,159** Saturday **midday** peak hour vehicle-trips, ~~compared to the proposed project's 848 weekday PM peak-hour vehicle-trips and 1,268 vehicle-trips in the Saturday midday peak-hour (about a 10 percent reduction from the proposed project).~~

On pages 15, 16, 109, and 110, the existing Cultural Resources mitigation measure is deleted and replaced with the following measure:

Cultural Resources

Based on a reasonable presumption that archeological resources may be present within the project site, the following measures shall be undertaken to avoid any potentially significant adverse effect from the proposed project on buried or submerged historical resources. The project sponsor shall retain the services of a qualified archeological consultant having expertise in California prehistoric and urban historical archeology. The archeological consultant shall undertake an archeological testing program as specified herein. In addition, the consultant shall be available to conduct an archeological monitoring and/or data recovery program if required pursuant to this measure. The archeological consultant's work shall be conducted in accordance with this measure at the direction of the Environmental Review

Officer (ERO). All plans and reports prepared by the consultant as specified herein shall be submitted first and directly to the ERO for review and comment, and shall be considered draft reports subject to revision until final approval by the ERO. Archeological monitoring and/or data recovery programs required by this measure could suspend construction of the project for up to a maximum of four weeks. At the direction of the ERO, the suspension of construction can be extended beyond four weeks only if such a suspension is the only feasible means to reduce to a less-than-significant level potential effects on a significant archeological resource as defined in CEQA *Guidelines* Section 15064.5 (a)(c).

Archeological Testing Program. The archeological consultant shall prepare and submit to the ERO for review and approval an archeological testing plan (ATP). The archeological testing program shall be conducted in accordance with the approved ATP. The ATP shall identify the property types of the expected archeological resource(s) that potentially could be adversely affected by the proposed project, the testing method to be used, and the locations recommended for testing. The purpose of the archeological testing program will be to determine to the extent possible the presence or absence of archeological resources and to identify and to evaluate whether any archeological resource encountered on the site constitutes an historical resource under CEQA.

At the completion of the archeological testing program, the archeological consultant shall submit a written report of the findings to the ERO. If based on the archeological testing program the archeological consultant finds that significant archeological resources may be present, the ERO in consultation with the archeological consultant shall determine if additional measures are warranted. Additional measures that may be undertaken include additional archeological testing, archeological monitoring, and/or an archeological data recovery program. If the ERO determines that a significant archeological resource is present and that the resource could be adversely affected by the proposed project, at the discretion of the project sponsor either:

- A) The proposed project shall be re-designed so as to avoid any adverse effect on the significant archeological resource; or
- B) A data recovery program shall be implemented, unless the ERO determines that the archeological resource is of greater interpretive than research significance and that interpretive use of the resource is feasible.

Archeological Monitoring Program. If the ERO in consultation with the archeological consultant determines that an archeological monitoring program shall be implemented the archeological monitoring program shall minimally include the following provisions:

- The archeological consultant, project sponsor, and ERO shall meet and consult on the scope of the AMP reasonably prior to any project-related soils disturbing activities commencing. The ERO in consultation with the archeological consultant shall determine what project activities shall be archeologically monitored. In most cases, any soils-disturbing activities, such as demolition, foundation removal, excavation, grading, utilities installation, foundation work, driving of piles (foundation, shoring, etc.), site remediation, etc., shall require archeological monitoring because of the risk these activities pose to potential archeological resources and to their depositional context;

- The archeological consultant shall advise all project contractors to be on the alert for evidence of the presence of the expected resource(s), of how to identify the evidence of the expected resource(s), and of the appropriate protocol in the event of apparent discovery of an archeological resource;
- The archeological monitor(s) shall be present on the project site according to a schedule agreed upon by the archeological consultant and the ERO until the ERO has, in consultation with project archeological consultant, determined that project construction activities could have no effects on significant archeological deposits;
- The archeological monitor shall record and be authorized to collect soil samples and artifactual/ecofactual material as warranted for analysis;
- If an intact archeological deposit were encountered, all soils-disturbing activities in the vicinity of the deposit shall cease. The archeological monitor shall be empowered to temporarily redirect demolition/excavation/pile driving/ construction activities and equipment until the deposit is evaluated. If in the case of pile driving activity (foundation, shoring, etc.), the archeological monitor has cause to believe that the pile driving activity may affect an archeological resource, the pile driving activity shall be terminated until an appropriate evaluation of the resource has been made in consultation with the ERO. The archeological consultant shall immediately notify the ERO of the encountered archeological deposit. The archeological consultant shall make a reasonable effort to assess the identity, integrity, and significance of the encountered archeological deposit, and present the findings of this assessment to the ERO.

Whether or not significant archeological resources are encountered, the archeological consultant shall submit a report of the findings of the monitoring program to the ERO.

Archeological Data Recovery Program. The archeological data recovery program shall be conducted in accord with an archeological data recovery plan (ADRP). The archeological consultant, project sponsor, and ERO shall meet and consult on the scope of the ADRP prior to preparation of a draft ADRP. The archeological consultant shall submit a draft ADRP to the ERO. The ADRP shall identify how the proposed data recovery program will preserve the significant information the archeological resource is expected to contain. That is, the ADRP will identify what scientific/historical research questions are applicable to the expected resource, what data classes the resource is expected to possess, and how the expected data classes would address the applicable research questions. Data recovery, in general, should be limited to the portions of the historical property that could be adversely affected by the proposed project. Destructive data recovery methods shall not be applied to portions of the archeological resources if nondestructive methods are practical.

The scope of the ADRP shall include the following elements:

- *Field Methods and Procedures.* Descriptions of proposed field strategies, procedures, and operations.
- *Cataloguing and Laboratory Analysis.* Description of selected cataloguing system and artifact analysis procedures.

- *Discard and Deaccession Policy.* Description of and rationale for field and post-field discard and deaccession policies.
- *Interpretive Program.* Consideration of an on-site/off-site public interpretive program during the course of the archeological data recovery program.
- *Security Measures.* Recommended security measures to protect the archeological resource from vandalism, looting, and nonintentionally damaging activities.
- *Final Report.* Description of proposed report format and distribution of results.
- *Curation.* Description of the procedures and recommendations for the curation of any recovered data having potential research value, identification of appropriate curation facilities, and a summary of the accession policies of the curation facilities.

Human Remains and Associated or Unassociated Funerary Objects. The treatment of human remains and of associated or unassociated funerary objects discovered during any soils disturbing activity shall comply with applicable State and Federal laws. This shall include immediate notification of the Coroner of the City and County of San Francisco and in the event of the Coroner's determination that the human remains are Native American remains, notification of the California State Native American Heritage Commission (NAHC), which shall appoint a Most Likely Descendant (MLD) (Public Resource Code Section 5097.98). The archeological consultant, project sponsor, and MLD shall make all reasonable efforts to develop an agreement for the treatment of, with appropriate dignity, human remains and associated or unassociated funerary objects (CEQA *Guidelines*, Section 15064.5(d)). The agreement should take into consideration the appropriate excavation, removal, recordation, analysis, custodianship, curation, and final disposition of the human remains and associated or unassociated funerary objects.

Final Archeological Resources Report. The archeological consultant shall submit a Draft Final Archeological Resources Report (FARR) to the ERO that evaluates the historical significance of any discovered archeological resource and describes the archeological and historical research methods employed in the archeological testing/monitoring/data recovery program(s) undertaken. Information that may put at risk any archeological resource shall be provided in a separate removable insert within the final report.

Once approved by the ERO, copies of the FARR shall be distributed as follows: California Archeological Site Survey Northwest Information Center (NWIC) shall receive one (1) copy and the ERO shall receive a copy of the transmittal of the FARR to the NWIC. The Major Environmental Analysis division of the Planning Department shall receive three copies of the FARR along with copies of any formal site recordation forms (CA DPR 523 series) and/or documentation for nomination to the National Register of Historic Places/California Register of Historical Resources. In instances of high public interest in or the high interpretive value of the resource, the ERO may require a different final report content, format, and distribution than that presented above.

Appendices A, B and C from the Comments and Responses document are included in this Final EIR as Appendices E, F, and G.

● VIII. EIR AUTHORS

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● IX. APPENDICES

The following appendices are provided as Volume 2 of this Environmental Impact Report:

- Appendix A: Initial Study
- Appendix B: Intersection Level of Service Designations
- Appendix C: Diesel Exhaust Particulate Health Risk Assessment
- Appendix D: Distribution List
- Appendix E: Comment Letters
- Appendix F: Transcript of Draft EIR Public Hearing and Index of Speakers
- Appendix G: Community Commitments of Home Depot, U.S.A., Inc.

This Environmental Impact Report has been published in two volumes:
Volume 1 includes the Environmental Impact Report
and Volume 2 includes the EIR's appendices and Comment Letters.

